

MAY 09 2017



ORANGE COUNTY
COASTKEEPER®

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May 4, 2017

VIA CERTIFIED MAIL

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Re: Supplemental Notice of Violations and Intent to File Suit Under the Federal Water Pollution Control Act

Dear Mr. Siegel, Mr. May, and Ms. Ross:

This letter provides notice that Orange County Coastkeeper ("Coastkeeper") intends to file suit pursuant to Section 301(a) of the Federal Water Pollution Control Act ("Clean Water Act," or "CWA"), 33 U.S.C.A. § 1311, against the City of San Juan Capistrano ("City") and Blenheim Facility Management, LLC ("Blenheim") for violating the CWA with regard to unpermitted discharges of pollutants from a point source into waters of the United States.

By letter dated March 31, 2017, and herein incorporated by reference, Coastkeeper notified the City and Blenheim of its intent to sue for CWA violations related to the City's MS4 permit and unpermitted dredge and fill activities in San Juan Creek. This supplemental notice concerns additional CWA violations of which Coastkeeper has become aware. Substantial portions of this letter mirror the March 31, 2017 Notice Letter ("First Notice Letter"). This notice of intent to file suit contains separate and distinct violations not contained in the First Notice Letter.

1. INTRODUCTION

The violations at issue are occurring on the City's property located at 27174 Ortega Highway, San Juan Capistrano, California 92675, known as the Rancho Mission Viejo Riding Park at San Juan Capistrano ("Riding Park" or "Facility"). The Riding Park is owned by the City and managed by Blenheim.

This supplemental notice of violations and intent to file suit ("Supplemental Notice Letter") is being sent to you as the responsible owners and operators of the Riding Park (hereinafter referred to collectively as "the Notice Recipients"). The purpose of this letter is to provide notice of the Notice Recipients' CWA violations and to give notice that, after the expiration of sixty (60) days from the date

of this letter, Coastkeeper intends to file a complaint regarding the violations of the Clean Water Act that are occurring at the Riding Park.

In 2016, Coastkeeper received complaints from its members regarding illegal activities taking place in and around the Riding Park in San Juan Capistrano, California. In response to these reports, Coastkeeper conducted an investigation to determine the severity of the problem. During the course of our investigation, Coastkeeper confirmed the Riding Park has more than 500 horses present for more than 45 days per year. Coastkeeper is informed and believes that approximately 2,500 horses circulated through the Riding Park between March 20, 2017 and April 15, 2017. Facilities with more than 500 horses for more than 45 days in a 12 month period are classified as Concentrated Animal Feeding Operations ("CAFOs"). 40 C.F.R. § 122.23. CAFOs are point sources under the CWA. 33 U.S.C.A. § 1362. As point sources, CAFOs may not discharge pollutants to waters of the United States except in compliance with an NPDES permit. 33 U.S.C. § 1311(a). Failure of the Notice Recipients to obtain an NPDES permit for the Riding Park is a violation of Section 301 of the CWA. *See* 40 C.F.R. § 122.21(d)(1).

Horse CAFOs produce a substantial amount of pollutants including manure, bedding, and process wastewater from the horse wash racks. Such animal waste and process wastewater discharged from the Riding Park are and/or contain "pollutants," as defined in CWA Section 502(6), 33 U.S.C.A. § 1362(6) and 40 C.F.R. § 122.2. Manure contains high levels of phosphorus and nitrogen. As a result of unlawful discharges to San Juan Creek, unlawful land application of process wastewater, and stormwater runoff from areas where horse waste is stored, the Notice Recipients have caused and continue to cause discharge of animal waste, nitrates, nitrites, nitrogen, ammonia, phosphorus, bacteria and endotoxin, sulfate and other pollutants into waters of the United States, resulting in substantial harm to public health, welfare and the environment. San Juan Creek is a 303(d) listed impaired water body for several pollutants known to be present at the Riding Park, including phosphorus and nitrogen. Unpermitted discharges from the Riding Park cause and contribute to the impairment of San Juan Creek.

In addition to pollutants typically associated with CAFOs, Coastkeeper is informed and believes that trash and debris are discharged from the Riding Park into waters of the United States. Multiple site investigations reveal ongoing discharges of large trash items, such as feed bags, plastic cups, plastic plant containers, and equestrian medicine applicators into San Juan Creek. In addition to large trash items, the Riding Park is also discharging small, particulate trash from the footing used in the dressage/event rings of the Riding Park. Footing is used in the equestrian event rings to provide cushion for the horses to prevent bone and joint injury. Coastkeeper is informed and believes that the footing used at the Riding Park is a combination of sand, recycled rubber shoes, and other unknown synthetic textiles. Therefore, footing qualifies as a pollutant. During its investigation, Coastkeeper observed footing tracked outside of the event rings and into waters of the United States, and in areas prone to flooding into waters of the United States, a continuous discharge of footing into waters of the United States. These individual examples of failure to comply with the requirements of the Clean Water Act, and those referenced below, are indicative but not exhaustive of activities, or failure to conduct necessary activities, occurring at the Riding Park property in violation of the Clean Water Act.

As set forth in this Supplemental Notice Letter, observations made by Coastkeeper investigators on multiple occasions indicate that the Notice Recipients are and continue to be in violation of the Clean Water Act. Generally, the property owners and/or operators have not obtained a CAFO permit

pursuant to Section 402 of the Clean Water Act, 33 U.S.C.A. § 1342, and have routinely discharged pollutants into San Juan Creek. Each day that pollutants such as manure, process wastewater, trash, and footing are discharged constitutes a separate violation of Section 301 of the Clean Water Act, 33 U.S.C.A. § 1311.

Section 505(b) of the Clean Water Act, 33 U.S.C. § 1365(b), requires that sixty (60) days prior to the initiation of a civil action against any alleged violator under Section 505(a) of the Clean Water Act, 33 U.S.C. § 1365(a), a citizen must give notice of her intent to sue to the discharger, the Administrator of the United States Environmental Protection Agency ("EPA"), the Regional Administrator for the EPA for the region in which such violation is alleged to have occurred, and the Chief Administrative Officer of the water pollution control agency for the State in which the violation is alleged to have occurred. 33 U.S.C. § 1365(b)(1)(A); 40 C.F.R. § 135.2(a)(1). This letter addresses at least 1,825 violations of Section 301 of the Clean Water Act, 33 U.S.C.A. § 1311.

2. FACTUAL BACKGROUND

2.1 Orange County Coastkeeper

Coastkeeper is a nonprofit organization that promotes and restores water resources that are drinkable, fishable, swimmable, and sustainable. Coastkeeper is an environmental group organized as a non-profit corporation in accordance with the laws of the State of California. Coastkeeper's offices are located at 3151 Airway Avenue, Suite F-110, Costa Mesa, California 92626. Coastkeeper is dedicated to protection and preservation, conservation, and restoration of waters, marine habitats and watersheds, through research, education, community action and citizen enforcement. Coastkeeper actively seeks federal and state agency implementation of the Clean Water Act and, where necessary, initiates enforcement actions on behalf of itself and its members.

Coastkeeper and its individual members have an interest in the preservation and use of waters in and around San Juan Capistrano, including, but not limited to the Pacific Ocean, San Juan Creek Mouth, San Juan Creek, and their tributaries. Specifically, Coastkeeper's members sail, swim, picnic, fish, hike, surf, paddle, standup paddleboard, kayak, wade, bike, and enjoy the wildlife in and around these waters, including the reach at issue in this Supplemental Notice Letter. The actions of the Notice Recipients individually, collectively, and in combination with the activities of other landowners adjacent to San Juan Creek, result in numerous injuries to Coastkeeper's interests, such as: loss, destruction or damage to wetlands and waterways; diminished aesthetic enjoyment; increased flooding; loss of open space and habitat for wildlife, including wading birds and federally protected species; degraded water quality; and diminished quality of life. The ability of Coastkeeper's members to engage in such activities and to use and enjoy San Juan Creek is harmed by Notice Recipients' activities.

2.2 The City of San Juan Capistrano

The City of San Juan Capistrano ("the City") is a municipality incorporated under the laws of the State of California. The Department of Public Works & Engineering ("Department") is a department of the City. The City and its Departments have offices at 32400 Paseo Adelanto, San Juan Capistrano, CA 92675. The Department's current Director is Steve W. May. The City's current City Manager is Benjamin Siegel. City and/or the Department are the owner(s) and/or operator(s) of the Riding Park.

The Clean Water Act provides that the owner of the land and operator of the land where operations are taking place is responsible for compliance with the provisions of the CWA. The Riding Park Property is located at 27147 Ortega Highway, San Juan Capistrano, California 92675. Information available to Coastkeeper indicates that the site's Assessor Parcel Number (APN) is 125-172-24, comprises 68.46 acres, and is owned by the City.

In 2010, the City acquired approximately 116 acres currently referred to herein as the Riding Park. In November 2014, the City entered into an agreement with Blenheim Facilities Management, LLC ("Blenheim") to provide management services for the Riding Park commencing on January 1, 2015. Under the terms of the Management Agreement, Blenheim manages approximately 70 acres of the Riding Park.

Pursuant to the terms of the Management Agreement, Blenheim's management term terminated as of 11:59 p.m. on December 31, 2016. On December 6, 2016, the City authorized a month-to-month extension of the Management Agreement for 2017.

2.3 Blenheim Facility Management, LLC

Blenheim Facility Management, LLC is an active Delaware limited liability company with its principal place of business located at 30753 La Pata Avenue, San Juan Capistrano, California 92675. The registered agent for service of process is Rebecca Ross, located at 30753 La Pata Avenue, San Juan Capistrano, California 92675. Blenheim Facility Management, LLC is responsible for management of the Riding Park pursuant to the management agreement with the City of San Juan Capistrano entered into on November 18, 2014, and extended on December 6, 2016.

Blenheim Facility Management, LLC hosts multiple equestrian competitions and shows at the Riding Park throughout the year. Based on a "Notice of Intent to Comply with the Conditional Waivers of Waste Discharge Requirements for Low Threat Discharges in the San Diego Region" submitted by Notice Recipients to the San Diego Regional Water Quality Control Board, there are 127 days where horses are present at the Riding Park. *See* Exhibits A and B. There are 58 days where over 500 horses are present at the Riding Park. *See* Exhibits A and B.

This Supplemental Notice Letter is being sent to the City as the owner the owner/operator of the Riding Park. The Supplemental Notice Letter is addressed to Blenheim as the operator of the Riding Park. Collectively, the City and Blenheim are the owner and/or operators of the property and responsible parties under the Clean Water Act.

2.4 San Juan Creek

San Juan Creek, the receiving water of the pollutants from the Riding Park generally drains towards the south and west with its headwaters in the Santa Ana Mountains. The San Juan Creek watershed encompasses a drainage of approximately 176 square miles and extends from the Cleveland National Forest in the Santa Ana Mountains to the Pacific Ocean at Doheny State Beach near Dana

Point Harbor.¹ The condition of San Juan Creek near the Riding Park is that of a large alluvial valley with an upper terrace dominated by oaks, and a lower, sycamore-dominated terrace with dynamic mulefat and willow communities.² An entangling understory of shrubs, flowering plants, and vines provides sites for nesting, shelter and shade for many animals. Algae and mosses proliferate in the water and on rocks. Leaves swept into the current decompose, adding nutrients and organic matter to waterways. Insects thrive here and in turn provide an abundant food source for invertebrates, fish, and birds. (CCC Online Coastal Resources Guide: Streams.) This dynamic creek system promotes maintenance of a compositionally and structurally complex and diverse plant community.³ As San Juan Creek flows past the Riding Park it mostly consists of an urbanized mixed of commercial, residential, and industrial land uses.⁴

The San Juan Creek watershed extends along an East-West Axis and drains approximately 176 square miles. San Juan Creek meanders through a floodplain with topography typical of coastal creeks and floodplains in Orange County. San Juan Creek is a naturally intermittent stream that presently carries significantly increased flows due to year-round municipal and agricultural return flows and during significant rain events (as evidenced by the considerable flooding during the 2005 winter storms). Waters from San Juan Creek near the Riding Park continue through the City, discharging at the terminus of San Juan Creek at the San Juan Creek Mouth to the Pacific Ocean at Doheny Beach State Park.

Coastal creeks such as San Juan Creek are a precious resource. “On their way to the ocean, California’s coastal streams and rivers flow through the canyons and valleys of coastal mountains, linking forest, chaparral, scrubland, grassland, and marsh. Riparian woodlands develop along stream banks and floodplains, and coastal wetlands and estuaries form where the rivers enter the sea. Rivers transport nutrients, sediments, and oxygen through the watershed, and life flourishes in their path.” *California Coastal Commission's California Coastal Resource Guide*, at <http://ceres.ca.gov/ceres/calweb/coastal/streams.html> (“CCC Online Coastal Resource Guide: Streams”).

In addition, coastal streams such as San Juan Creek serve several important ecological functions including trapping of excess sediment and storing and transforming excess organic matter, preventing it from reaching downstream waters. *Where Rivers Are Born: The Scientific Imperative for Defending Small Streams and Wetlands*, Sierra Club (September 2003) available at http://www.sierraclub.org/cleanwater/reports_factsheets/. Upstream waters, such as San Juan Creek, where more water makes direct contact with the stream bed, help remove excess nutrients in the water – a problem often associated with urban development and the use of fertilizers on lawns and gardens. The channel shape of coastal streams further facilitates that sequestration and transformation of organic material and sediment.

¹ U.S. Army Corps of Engineers, South Pacific Div., *Record of Decision for Revoking the Use of Selected Nationwide Permits within the San Juan Creek/Western San Mateo Creek Watersheds for the Special Area Management Plan Orange County, Cal.*, 1 (July 2010).

² Smith, Daniel R., Klimas, C.V., U.S. Army Corps of Engineers, Los Angeles Dist., Reg. Branch, *Riparian Ecosystem Restoration Plan for San Juan Creek and Western San Mateo Creek Watersheds: General Design Criteria and Site Selection*, 24 (Aug. 2004).

³ *Id.* at 16.

⁴ *Supra*, fn 1.

Coastal streams and the adjacent estuarine and riparian habitats throughout California also support a wide variety of flora and fauna, including endangered species such as the Pacific pocket mouse, the Southern California Coast Steelhead, the Quino checkerspot butterfly, the southwestern willow flycatcher, and many other species. Portions of San Juan Creek have specifically been identified as critical habitat for a Southern California Coast Steelhead Biogeographic Population Group (“BPG”). The National Marine Fisheries Service’s species Recovery Plan identified threats to Southern California Coast Steelhead DPS restoration efforts in San Juan Creek and concluded culverts were a “very high threat,” and that dams, surface water diversions, and roads are “medium threat” sources.⁵ Physical modification of road crossings between estuary and upstream spawning and rearing habitats and the passage of smolts and kelts downstream to the estuary and ocean are specifically identified critical recovery actions for San Juan Creek’s Santa Catalina Gulf Coast BPG of Southern California Steelhead.⁶

San Juan Creek is designated a principal stream system in the San Diego Regional Water Quality Control Board’s Water Quality Control Plan (“Basin Plan”). Pursuant to its authority over designated water bodies, the Regional Board has designated several beneficial uses for San Juan Creek and the water bodies into which they drain.⁷ Beneficial uses are intended to represent the purposes of the water body that are specifically protected by the Clean Water Act. When those uses are not attained, the Regional Board designates the water body as impaired under Section 303(d) of the Clean Water Act. In this regard, the receiving waters of pollution from the Riding Park area is impaired. The waters of San Juan Creek downstream of the Riding Park is listed under Section 303(d) as impaired for pollutants including, but not limited to, Indicator Bacteria, Phosphorus, Total Nitrogen as N, Toxicity, DDE, and Selenium. Overall, the San Juan Creek watershed is highly impaired. Thus, the discharge of stormwater carrying the byproducts of the facility, including horse waste, bedding material, feed, metals, trash, footing, and other materials are contributing to, and threatening, San Juan Creek and downstream receiving waters. Similarly, the illegal discharge of non-stormwater, including manure, footing, sediment and other fill material, construction wastes, debris, and other material into San Juan Creek contributes to the impairment of the receiving waters.

San Juan Creek is a water of the United States as defined in the Clean Water Act. The U.S. Army Corps of Engineers defines water of the United States as all waters which are currently used in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide, which are used for, among other purposes, the harvesting of fish sold in interstate commerce. 33 C.F.R. § 328.3(a)(1)(i). Waters tributary to these waters are also waters of the United States. *See* 33 C.F.R. § 328.3(a)(5). The waters of the Pacific Ocean at San Juan Creek Mouth are subject to the ebb and flow of the tides. San Juan Creek is tributary to the San Juan Creek Mouth. Therefore, San Juan Creek is a water of the United States.

⁵ National Marine Fisheries Service – Southwest Regional Office, *Southern California Steelhead Recovery Plan Summary*, 18 (Jan. 2012).

⁶ National Marine Fisheries Service, *Southern California Steelhead Recovery Plan*, Table 13-3, 13-20 (Jan. 2012).

⁷ According to the Basin Plan, San Juan Creek’s existing beneficial uses include: agricultural supply, industrial service supply, contact water recreation, non-contact water recreation, warm freshwater habitat, cold freshwater habitat, wildlife habitat. Likewise, the beneficial uses on the San Juan Creek Mouth, where San Juan Creek meets the Pacific Ocean, includes contact water recreation, non-contact water recreation, wildlife habitat, rare, threatened, or endangered species, marine habitat, migration of aquatic organisms, and shellfish harvesting. *Water Quality Control Plan, San Diego Region*, Regional Water Quality Control Board, San Diego Region, Tables 2-2, 2-3 (updated May 17, 2016).

3. LEGAL BACKGROUND OF CONCENTRATED ANIMAL FEEDING OPERATIONS

Section 301 of the CWA, 33 U.S.C.A. § 1311(a), prohibits the discharge of pollutants into waters of the United States by any person from a point source except in accordance with certain provisions under the CWA, including the requirement for a discharge to be authorized under Section 402, 33 U.S.C.A. § 1342. The CWA defines a point source as:

“[A]ny discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, **concentrated animal feeding operation**, or vessel or other floating craft, from which pollutants are or may be discharged. This term does not include agricultural stormwater discharges and return flows from irrigated agriculture.” *Emphasis added.* 33 U.S.C.A. § 1362(14).

To be a concentrated animal feeding operation (“CAFO”) the facility must meet a two-part test. First, the facility must be an Animal Feeding Operation (“AFO”). An AFO is:

“[...] a lot or facility (other than an aquatic animal production facility) where the following conditions are met:

- (i) Animals (other than aquatic animals) have been, are, or will be stabled or confined and fed or maintained for a total of 45 days or more in any 12-month period, and
- (ii) Crops, vegetation, forage growth, or post-harvest residues are not sustained in the normal growing season over any portion of the lot or facility.” 40 C.F.R. § 122.23.

The EPA considers an animal to be at the facility for a full day if it is at the facility for any portion of a day.⁸ This definition includes, for example, “dairy cows that are brought in from pasture for less than an hour to be milked are counted as being confined [...] for the day.”⁹ Additionally, the 12-month period is any 12-month period and need not correspond with a calendar year.¹⁰ The EPA further clarifies that crops, vegetation, forage growth, or post-harvest residues does not include incidental growth on small portions of the confinement area.¹¹

Second, the facility must confine the necessary number and type of animals to be classified a CAFO. For horses, there must be 500 horses or more for the facility to be classified as a large CAFO. 40 C.F.R. 122.23(4)(vi). A facility is a medium CAFO if it has 150-499 horses and it either: (1) discharges “into waters of the United States through a man-made ditch, flushing system, or other similar man-made device”; or (2) “[p]ollutants are discharged directly into waters of the United States which originate outside of and pass over, across, or through the facility or otherwise come into direct contact with the animals confined in the operation.” 40 C.F.R. § 122.23(6).

For facilities smaller than a medium CAFO, the EPA may designate any AFO as a CAFO if it determines that the AFO is a significant contributor of pollutants to waters of the United States. 40

⁸ NPDES Permit Writers’ Manual for CAFOs. https://www.epa.gov/sites/production/files/2015-08/documents/cafo_permitmanual_chapter2.pdf. Accessed April 24, 2017.

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

C.F.R. § 122.23. In other words, regardless of the number of animals present at any given facility, the EPA may find that the facility is a significant contributor of pollutants and classify the AFO as a CAFO in need of NPDES permitting coverage. Every discharge of pollutants from a CAFO into waters of the United States without a NPDES permit is a violation of Section 301 of the CWA, 33 U.S.C.A. § 1311.

The requirements of an NPDES permit for a CAFO are the same as those issued to other point sources. The CAFO permit must contain effluent limitations, monitoring and reporting requirements, record-keeping requirements, special conditions, and standard conditions to ensure the CAFO is complying with the CWA.¹² Like all NPDES permits, a CAFO permit must include technology-based effluent limitations (“TBELs”). However, a CAFO permit must also include more stringent water quality-based effluent limitations (“WQBELs”) when such limitations are necessary to meet water quality standards when those standards are not being met. Additionally, all CAFO permits must include a requirement to implement a nutrient management plan (“NMP”), that at a minimum, contains best management practices necessary to meet enumerated requirements and applicable effluent limitations and standards. 40 C.F.R. § 122.42(e)(1). Those enumerated requirements include: (1) manure and process wastewater storage; (2) management of mortalities; (3) diversion of clean water from the production area; (4) prevention of direct contact of confined animals to waters of the United States; (5) chemical and contaminant management of manure, litter, process wastewater, storm water storage or treatment; (6) conservation practices; (7) protocols for testing manure, litter, process wastewater, and soil; (8) protocols for applying manure, litter, or process wastewater in accordance with the site-specific NMP; and (9) record keeping. *Id.* The terms of the NMP are enforceable effluent limitations that must be included in the permit.¹³

CAFOs are also subject to industrial stormwater permitting requirements of 40 C.F.R. § 122.26. This regulation requires operators of facilities subject to storm water permitting that discharge stormwater associated with industrial activities to obtain an NPDES permit.¹⁴ Large CAFOs, as defined in 40 C.F.R. §§ 122.23 and 412, are included as facilities considered engaged in industrial activity under 40 C.F.R. § 122.26(b)(14)(i).¹⁵ Consequently, large CAFOs are subject to regulation of storm water discharges under 40 C.F.R. § 122.26, regardless of whether they are subject to the CAFO requirements under part 122.23. *Id.* Industrial stormwater permit requirements apply to any stormwater discharges associated with industrial activity at a large CAFO that is not otherwise regulated under parts 122.23 and 412. *Id.* To clarify, portions of CAFOs which are not subject to CAFO permit requirements may still be subject to NPDES permit requirements if the CAFO discharges stormwater because CAFOs are defined in regulation as areas of industrial activity under the industrial stormwater permit.

The Stormwater Permit contains discharge prohibitions, effluent limitations, receiving water limitations, requirements for storm water pollution prevention plans (“SWPPPs”), monitoring and reporting programs (“M&RPs”), exceedance response actions (“ERAs”) contingent on a facility’s performance, and annual reporting requirements. Every discharge of stormwater from an area of

¹² NPDES Permit Writers’ Manual for CAFOs, <https://www.epa.gov/npdes/npdes-permit-writers-manual-concentrated-animal-feeding-operations>, Ch. 4 (Last Accessed May 3, 2017).

¹³ *Waterkeeper Alliance v. EPA*, 399 F.3d 486, 502 (2d Cir. 2005).

¹⁴ National Pollutant Discharge Elimination System (“NPDES”) General Permit No. CAS000001, Water Quality Order 2014-0057-DWQ (hereinafter referred to as “Stormwater Permit”), Finding 3.

¹⁵ *Supra* 16, at 4-19.

industrial activity at a CAFO into waters of the United States without industrial stormwater permit coverage is a violation of Section 301 of the Clean Water Act, 33 U.S.C.A. § 1311.

Section 505 of the CWA, 33 U.S.C. § 1365, authorizes citizen enforcement for violations of any effluent standard or limitation in effect under the CWA, including the failure to obtain an NPDES permit. 33 U.S.C. § 1365(f)(5).

4. NOTICE RECIPIENTS' FAILURE TO OBTAIN A CAFO PERMIT

4.1. The Riding Park is a Large CAFO

The Riding Park meets the regulatory definition of an Animal Feeding Operation ("AFO"). An AFO is a facility where animals are confined and fed or maintained for a total of 45 days or more in a 12-month period where crops, vegetation, or forage growth are not maintained in the normal growing season. 40 C.F.R. § 122.23. Based upon information submitted by Notice Recipients in the "Notice of Intent to Comply with the Conditional Waivers of Waste Discharge Requirements for Low Threat Discharges in the San Diego Region" (attached hereto as Exhibit A, hereinafter "NOI") submitted by Notice Recipients to the San Diego Regional Water Quality Control Board, in 2016 there were 127 days where horses were present at the Riding Park. There are no crops or forage growth maintained on the property where horses are permitted to graze. As is typical of an equestrian event center such as the Riding Park, horses are confined to stables when on the property. Thus, the Riding Park is an AFO.

Due to the number of horses present at the Riding Park during a 12-month period, the Riding Park also meets the regulatory definition of a large CAFO. As stated above, a large horse CAFO is an AFO with over 500 horses. 40 C.F.R. § 122.23(4)(vi). As reported by Notice Recipients in the NOI, there were 58 days where over 500 horses were present at the Riding Park. (Attached hereto as Exhibit B is an excel spreadsheet that calculates the number of days and number of horses reported by Notice Recipients in Exhibit A.) Based on information available to Coastkeeper, the number of horses reported in 2016 is representative of a typical year of equestrian events at the Riding Park. Thus, the Riding Park is a large CAFO.

Exhibit B illustrates that over the course of 127 days in 2016, there were 8,354 horses at the Riding Park. On the 58 days where more than 500 horses were present at the Riding Park, a total of 5,276 horses were at the Riding Park. The amount of manure and pollutants produced at the Riding Park is a substantial source pollution affecting water quality. Similar to other horse CAFOs, such as racetracks, the Riding Park generates a substantial amount of manure, bedding, and process wastewater, trash, footing, and other pollutants. As a large CAFO, the Riding Park is considered a point source, subject to NPDES Permitting pursuant to Section 402 of the CWA, 33 U.S.C.A. § 1342.

4.2. The Riding Park Does Not Have NPDES Permit Coverage

The Riding Park does not have the required NPDES permit coverage that would allow the facility to discharge pollutants pursuant to Section 402 of the CWA, 33 U.S.C.A. § 1342. Section 301 of the CWA, 33 U.S.C.A. § 1311, prohibits the discharge of a pollutant from a point source without a permit. The Riding Park is an AFO which confines greater than 500 horses on site for more than 45-days in a 12-month period. As such, the Riding Park is a large CAFO and, by definition, a point source. 33 U.S.C.A. § 1362. A CAFO must be covered by an NPDES permit at the time it discharges. 40 C.F.R. 122.23(f). In order to obtain authorization under an NPDES permit, the CAFO owner or operator must either apply for an individual NPDES permit or submit a notice of intent for coverage under an NPDES general permit. 40 C.F.R. § 122.23(d)(1). Coastkeeper's investigations failed to yield evidence of an individual CAFO permit for the Riding Park issued by the San Diego Regional Water Quality Control Board and the region has not adopted a NPDES general permit for CAFOs. The lack of a CAFO permit is further evidenced by the Notice Recipients' attempt to obtain Conditional Waiver of Waste Discharge Requirements coverage by filing an NOI for discharges from animal operations. Every day the Riding Park operates without a CAFO permit is a separate and distinct violation of Section 301 of the CWA, 33 U.S.C.A. § 1311.

4.3 Effluent Limitations Applicable to CAFOs

Pursuant to CWA Section 402, 33 U.S.C.A. § 1342, the state may issue an NPDES permit which authorizes the discharge of pollutants into navigable waters of the United States, upon the condition that such discharge will meet all applicable requirements of the CWA. If issued, the state is directed to prescribe conditions for NPDES permits to assure compliance with the requirements of the CWA, including conditions on data and information collection, reporting, and other such requirements as the state deems appropriate. Among the conditions and limitations prescribed in the NPDES permits issued under CWA Section 402(a), 33 U.S.C.A. § 1342(a), are effluent limitations. Effluent limitations, as defined in CWA Section 502(11), 33 U.S.C.A. § 1362(11), are restrictions on the quantity, rate, and concentration of chemical, physical, biological, and other constituents of wastewater discharges.

Section 301(b), 33 U.S.C.A. § 1311(b), requires that all NPDES point sources achieve compliance with TBELs. TBELs for CAFOs must address all discharges from a CAFO. 40 C.F.R. § 122.42(e). In general, CAFO permits include limits for process wastewater discharges from the CAFO's production area and land application area. For large horse CAFOs, production area TBELs prohibit all discharges of "process wastewater" to waters of the United States. 40 C.F.R. § 412.13(a). Process wastewater means water directly or indirectly used in operation of the AFO for activities including: washing, cleaning, or flushing AFO facilities; washing or spray cooling animals; dust control; or any water that comes into contact with any raw materials, products, or byproducts including manure, litter, feed, milk, or bedding. 40 C.F.R. § 122.23(b)(7); 40 C.F.R. § 412.2(d). The discharge of process wastewater is permissible only when rainfall events cause an overflow of process wastewater from a facility designed, constructed, operated, and maintained to contain all process-generated wastewaters plus the runoff from a 25-year, 24-hour rainfall event at the location of the point source. 40 C.F.R. § 412.13(b). Coastkeeper is informed and believes, and thereon alleges, Notice Recipients' activities at the Riding Park resulted in the discharge of process wastewater to waters of the United States directly and indirectly from each onsite wash rack, as evidenced by photographs taken by Coastkeeper investigators on May 3, 2017. *See* Exhibit C. Further, Coastkeeper alleges the Riding Park discharges process

wastewater during dry weather and wet weather events below a 25-year, 24-hour rainfall event, in violation of the TBEL.

Land application discharges from a CAFO are also subject to NPDES permitting. 40 C.F.R. § 122.23(e). The discharge of process wastewater to waters of the United States from a CAFO as a result of the application of process wastewater by the CAFO to land areas under its control is a discharge subject to NPDES permit requirements, except when applied in accordance with a site-specific NMP. *Id.* Coastkeeper is informed and believes, and thereon alleges, that Notice Recipients use process wastewater for dust control throughout the site and without a NMP. This process wastewater discharges to waters of the United States, specifically onsite jurisdictional waters, in violation of TBELs and Section 301 of the Clean Water Act, 33 U.S.C.A. § 1311.

4.4. The Riding Park Discharges Pollutants into Waters of the United States

Coastkeeper is informed and believes that pollutants from the Riding Park have been and are continually discharged to San Juan Creek and onsite jurisdictional waters. Pollutants include but are not limited to horse manure, bedding, sediment, equine footing, trash, and other pollutants associated with equine operations. Coastkeeper is further informed that the Riding Park has stormwater and non-stormwater discharges of pollutants into San Juan Creek and jurisdictional waters are ongoing and continuous. During rain events, rain falls onto the Riding Park and runs through the stable and manure areas towards San Juan Creek. Stormwater comes into direct contact with manure and bedding from the stables, which have only dirt floors and temporary walls. Water then flows towards the southwest into San Juan Creek, taking along with it pollutants such as phosphorus, nitrogen, trash, and bacteria.

During the equestrian event season, pollutants are also discharged from the facility in dry weather. For example, process wastewater from the horse wash rack stations regularly escape the wash racks and the infiltration basin, eroding the creek bed and discharging process wastewater into the creek. Some wash racks are located no more than five feet from the creek bank. Other pollutants, such as plastic cups, food wrappers, plastic and glass bottles, paper plates, equine medicine applicators, feed bags, and other forms of trash blow into the creek or are deliberately dumped there by invitees of the Riding Park. Dumpsters are kept next to the creek and piled high with light trash, such as feed bags, enabling light breezes to carry trash to the creek. Coastkeeper's investigators have observed piles of manure and used bedding that have been pushed into the creek bank. Coastkeeper's investigators have also observed water trucks discharging process wastewater onto and near exhibition rings. We have observed and documented drains under the exhibition rings discharge into onsite jurisdictional waters during dry weather events. Coastkeeper is informed and believes that there are various other discharges of pollutants not specifically mentioned herein for which Notice Recipients are liable. Each discharge of a pollutant into waters of the United States without a CAFO permit is a violation of Section 301 of the CWA, 33 U.S.C.A. § 1311.

5. NOTICE RECIPIENTS' FAILURE TO OBTAIN STORMWATER PERMIT COVERAGE

5.1 The Riding Park Includes Areas of Industrial Activities

In California, owners and/or operators of any facility with industrial activities described in Attachment A of the Stormwater Permit are required to obtain permit coverage prior to discharging to waters of the United States.¹⁶ Information available to Coastkeeper indicates the Riding Park includes at least one fenced building where industrial activities including metal welding, metal work and repair, waste and recyclable metal management, metal storage, and vehicle maintenance occur. Most, if not all, of the industrial activities occur outside and without significant cover. Some activities, including horse-related industrial activities involving metalwork, are performed at remote locations onsite away from the building. Pollutants associated with these activities, include but are not limited to: pH-affecting substances; metals, such as iron and aluminum; toxic metals, such as copper, lead and zinc; TSS; gasoline and diesel fuels; fuel additives; coolants; trash; specific conductance affecting substances; nitrate as nitrogen; and oil and grease. Coastkeeper is informed and believes, and thereon alleges, Notice Recipients are required to obtain Stormwater Permit coverage for those portions of the Riding Park where industrial activities described in Attachment A are taking place. Each discharge of pollutants from the Riding Park to waters of the United States without Stormwater Permit coverage is a violation of Section 301 of the Clean Water Act, 33 U.S.C.A. § 1311.

5.2 The Riding Park does not have Stormwater Permit Coverage

In California, the owners and/or operators of any facility that discharges storm water associated with industrial activities, as defined in 40 C.F.R. § 122.26, to waters of the United States must first obtain coverage under the Stormwater Permit. *See* 33 U.S.C.A. §§ 1311, 1342; 40 C.F.R. § 126.26(c)(1); Stormwater Permit, Discharge Prohibition A. The Stormwater Permit regulates industrial storm water discharges from specific categories of industrial facilities identified in Attachment A, which includes CAFOs. Stormwater Permit, Attachment A.1; 40 C.F.R. Part 412. Separate from the CAFO related industrial activities, the Riding Park's maintenance and metal repair activities are industrial activities covered under the Stormwater Permit. Consequently, since the Riding Park facility is a CAFO and engaged in industrial activities, the Notice Recipients must obtain coverage under the Stormwater Permit unless they are regulated by a separate individual or general NPDES permit. *See* 33 U.S.C.A. §§ 1311, 1342; 40 C.F.R. § 126.26(c)(1); Stormwater Permit, Discharge Prohibition A. Coastkeeper is informed and believes, and thereon alleges that the Riding Park has not been enrolled under the Stormwater Permit by the Notice Recipients. Information available to Coastkeeper indicates the Riding Park has illegally discharged storm water into waters of the United States during every measureable rain event since May 4, 2012. *See* Attachment D. Information available to Coastkeeper indicates the Riding Park continues to discharge non-stormwater from industrial areas. *See* Attachment C.

By failing to obtain Stormwater Permit coverage and comply with the requirements of the Stormwater Permit, including SWPPP and M&RP requirements, the Notice Recipients have violated the Stormwater Permit and the Clean Water Act. *See* 33 U.S.C.A. §§ 1311, 1342; 40 C.F.R. §§ 122.26(c)(1), 122.41(a); Water Quality Order No. 97-03-DWQ, Section C.1; Stormwater Permit, Standard Condition

¹⁶ Stormwater Permit, Finding 9.

A. Discharges of non-stormwater and stormwater from areas of industrial activity to waters of the United States from the Riding Park are ongoing and continuous, having occurred since at least May 4, 2012, in violation of the Stormwater Permit and Section 301 of the Clean Water Act, 33 U.S.C.A. § 1311.

6. CONCLUSION

In addition to the violations set forth above, this Supplemental Notice Letter covers all violations of the Clean Water Act by the Notice Recipients as evidenced by information that becomes available to Coastkeeper after the date of this Supplemental Notice Letter. Specifically, Coastkeeper puts the Notice Recipients on notice that it intends to include all violations of the CWA in its federal citizen enforcement suit.

Pursuant to Section 309(d) of the Clean Water Act, 33 U.S.C. § 1319(d), and the Adjustment of Civil Monetary Penalties for Inflation, 40 C.F.R. § 19.4 (1997), each separate violation of the Clean Water Act subjects the violator of a penalty of up to \$37,500.00 per day per violation for all Clean Water Act violations after January 12, 2009 and \$51,570.00 per day per violation for violations that occurred after November 2, 2015. In addition to civil penalties, Coastkeeper will seek injunctive relief preventing further violations of the Clean Water Act pursuant to Sections 505(a) and (d), 33 U.S.C. § 1365(a) and (d), and other such relief as is permitted by law. Lastly, Section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs and fees.

Coastkeeper has retained legal counsel to represent them in this matter. All communications concerning this notice should be addressed to:

Jennifer F. Novak
Law Office of Jennifer F. Novak
500 Silver Spur Road, Suite 206
Rancho Palos Verdes, California, 90275

During the 60-day notice period, Coastkeeper would like to discuss effective remedies with the Notice Recipients to address the violations noted in this Supplemental Notice. If the Notice Recipients wish to pursue such discussions, we suggest that it initiate those discussions immediately. At the close of the 60-day notice period, Coastkeeper intends to move forward with litigation to prevent ongoing violations of the Act.

Supplemental Notice of Violation and Intent to File Suit
May 4, 2017
Page 14 of 15

Coastkeeper further intends to file its initial complaint at the end of the notice period for the First Notice Letter sent on March 31, 2017 for the claims noticed therein barring a settlement prior to that date. Coastkeeper will amend its complaint for the claims noticed herein at the end of the 60-day notice period.

Regards,

A handwritten signature in black ink, appearing to read "Colin Kelly", written over a horizontal line.

Colin Kelly
Senior Staff Attorney
Orange County Coastkeeper

cc: (see attached service list)

SERVICE LIST

Scott Pruitt
Administrator
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William Jefferson Clinton Building
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Washington, D.C. 20460

Alexis Strauss
Acting Regional Administrator
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Col. Kirk E. Gibbs, District Commander
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San Diego Region
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Thomas Howard
Executive Director
State Water Resources Control Board
P.O. Box 100
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EXHIBIT A

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, SAN DIEGO REGION
ORDER NO. R9-2014-0041
(ATTACHMENT A)



NOTICE OF INTENT

TO COMPLY WITH THE CONDITIONAL WAIVERS OF WASTE DISCHARGE
REQUIREMENTS FOR LOW THREAT DISCHARGES IN THE SAN DIEGO REGION

I. PROPERTY/FACILITY INFORMATION

Property/Facility Name: Rancho Mission Viejo Riding Park at San Juan Capistrano			
Property/Facility Contact: Melissa Brandes, VP Operations and Marketing			
Property/Facility Address: 30753 La Pata Avenue			
City: San Juan Capistrano	County: Orange	State: CA	Zip: 92675
Telephone: 949-234-1695	Fax: N/A	Email: melissbrandes@aol.com	
Assessor Parcel Number(s):		Hydrologic Area/Subarea: 901.28	

II. PROPERTY/FACILITY OWNER INFORMATION

Property/Facility Owner Name: City of San Juan Capistrano			
Property/Facility Owner Mailing Address: 32400 Paseo Adelanto			
City: San Juan Capistrano	County: Orange	State: CA	Zip: 92675
Telephone: 949-493-1171	Fax: N/A	Email: cview@sanjuancapistrano.org	

III. PROPERTY/FACILITY OPERATOR INFORMATION

Property/Facility Operator Name: Melissa Brandes, VP Operations and Marketing			
Mailing Address: PO Box 639			
City: San Juan Capistrano	County: Orange	State: CA	Zip: 92693
Telephone: 949-234-1695	Fax: N/A	Email: melissbrandes@aol.com	

IV. CONDITIONAL WAIVER FOR NOTICE OF INTENT

Mark (X) the waiver proposed for the discharge:

<input type="checkbox"/> Waiver No. 1 - Discharges from on-site graywater disposal systems
<input type="checkbox"/> Waiver No. 2 - Discharges of recycled water to land
<input type="checkbox"/> Waiver No. 3 - "Low" threat" discharges to land
<input type="checkbox"/> Waiver No. 4 - Discharges of winery waste to lined evaporation ponds wineries
<input type="checkbox"/> Waiver No. 5 - Discharges of wastes at composting facilities
<input type="checkbox"/> Waiver No. 6 - Discharges from silvicultural operations
<input checked="" type="checkbox"/> Waiver No. 7 - Discharges from animal operations
<input type="checkbox"/> Waiver No. 8 - Discharges from aquatic animal production facilities
<input type="checkbox"/> Waiver No. 9 - Discharges of slurries to land
<input type="checkbox"/> Waiver No. 10 - Discharges/disposal of solid wastes to land
<input type="checkbox"/> Waiver No. 11 - Aerially discharged wastes over land
<input type="checkbox"/> Waiver No. 12 - Discharges of emergency/disaster related wastes

V. DESCRIPTION OF DISCHARGE

Describe the discharge (i.e., source(s) of discharge, pollutants of concern, period and frequency, etc.). Use additional pages as needed. Provide a map of the property/facility if necessary. See Additional Pages

VI. DESCRIPTION OF MANAGEMENT MEASURES/BEST MANAGEMENT PRACTICES

Describe what management measures (MMs) and best management practices (BMPs) will be implemented to minimize or eliminate the discharge of pollutants to waters of the State. Use additional pages as needed. Provide a map of the property/facility showing locations of MMs/BMPs if necessary.

See Additional Pages

VII. ADDITIONAL INFORMATION

Please provide additional information, as needed or required, about the discharge and/or how the discharger intends to comply with the waiver conditions of the waiver. Use additional pages as needed.

See Additional Pages

VIII. CERTIFICATION

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Melissa Brandes

Signature (Owner or Authorized Representative)

2/28/17

Date

Melissa Brandes

Print Name

V.P. of Operations and Marketing

Title

949-212-8556

Telephone Number

melissbrandes@aol.com

Email

Additional Pages for:

*Notice of Intent to Comply with the Conditional Waiver of Waste Discharge Requirements for
Low Threat Discharges in the San Diego Region.*

Rancho Mission Viejo Riding Park at San Juan Capistrano

V. Description of Discharge.

1. Facility Information.

The Rancho Mission Viejo (RMV) Riding Park at San Juan Capistrano (collectively "Riding Park") in the City of San Juan Capistrano is a short-term multi-use sports and exhibition facility. Activities within the Riding Park include youth and adult soccer, community outreach events, and equestrian shows.

An overview of the Riding Park and the land use practices within the park are shown in Figure 1-1. The Riding Park is 60.2 acres in size and the various land uses areas within the park are listed below in Table 1-1.

Table 1-1. Riding Park Land Uses and Areas (in acres).

Land Use	Area (acre)	Percent of Total Area
Multi-Sport Field	23.9	39.7%
Exhibition Arena	10.0	16.6%
Stables	9.9	16.4%
Parking Lot	9.0	15.0%
Storage Area	4.5	7.5%
Workshop and Offices	2.9	4.8%
Overall Riding Park	60.2	100%

Note to Table 1-1. (%) means percent.

2. Sources of Discharge.

Discharge sources within the Riding Park include the following:

- a) Non-stormwater based discharges from the following sources:
 - Multi-Sport Field irrigation
 - Potable line (hose) connections to campers
 - Spills and leaks from Portable toilets
 - Equine (Horse) Wash Racks
 - Spills and leaks from onsite wastewater holding tank (office complex)
- b) Stormwater based discharges as a result of precipitation

Figure 1-1. Rancho Mission Viejo Riding Park Overview and Land Use Map.



3. Pollutants of Concern

a) Regulatory Listed Pollutants of Concern

The RMV Riding Park is located within the San Juan Creek watershed. San Juan Creek has an established TMDL for indicator bacteria, and the waterbody is listed on the 2010 Clean Water Act section 303(d) list for Total Nitrogen, Phosphorus, Organochlorine pesticides (DDE), Selenium, and Toxicity.

b) Period and Frequency of Pollutant Generating Activities

Soccer and community outreach events held at the Riding Park range in time from one (1) to seven (7) days in duration, as defined by the move-in until move-out date. The event dates and duration of each event are provided in Attachment 1 and the schedule is titled "Blenheim Facility Management Event Schedule."

Equestrian services provided at the Riding Park are limited to short-term stable rentals and exhibition arenas for events. The Riding Park provides "over-night" hotel-like accommodations and does not provide a continuous year-round type of boarding service as provided by a traditional equestrian facility. The Riding Park also does not provide any open fields suitable for grazing.

The Conditional Waiver Waste Discharge Requirement (WDR) permit includes two definitions of Animal Feeding Operations (AFO), based on year-round boarding of horses, as follows.

Table 3-1. Conditional Waiver WDR Allowed Annual Number of Horse-Days.

AFO Category	Allowed Days per Calendar Year	No. of Horses Boarded Per Day	Allowed Number of Horse-Days Per Year
Small AFO	365	299	109,135
Medium AFO	365	999	364,635

Notes to Table 3-1. AFO = Animal Feeding Operation. Horse-Days are defined as the number of horses present on site multiplied by the number of days each horse is present (# Horses X # Days = #Horse-Days). Leap year allowed limits are 109,434 horse-days for small sized AFOs and 365,634 horse-days for medium sized AFOs.

The Riding Park holds approximately twenty-five (25) events per year ranging in time from three (3) to eighteen (18) days in duration, as defined by the move-in until move-out date. The event dates and duration of each event are provided in Attachment 1 and the schedule is titled "Blenheim Facility Management Event Schedule.

A summary of the events, event dates, and the number of horses present at the park during calendar year 2016 is presented in Table 3-2.

Table 3-2. RMV Riding Park Equestrian Annual Schedule of Events and Number of Horses Present.

Event/Title	Move-In Date	Move-Out Date	Number of Event Days	Horses Present	Horse-Days
Orange County Interscholastic Eq League (IEL 7&8)	1/15/2016	1/17/2016	3	76	228
Blenheim Spring Classic I	3/21/2016	3/28/2016	8	290	2,320
Blenheim Spring Classic II	3/28/2016	4/4/2016	8	516	4,128
Dressage - Festival of the Horse (SP Spring Festival)	3/31/2016	4/2/2016	3	290	870
Blenheim Spring Classic III	4/4/2016	4/11/2016	8	766	6,128
Blenheim Spring Classic IV	4/11/2016	4/18/2016	8	704	5,632
Victory Horse Show #1	5/20/2016	5/22/2016	3	186	558
Blenheim June Classic I	6/6/2016	6/13/2016	8	810	6,477
Blenheim June Classic II	6/13/2016	6/20/2016	8	719	5,752
Blenheim June Classic III	6/20/2016	6/27/2016	8	612	4,896
Blenheim Red White & Blue Classic	6/27/2016	7/3/2016	7	364	2,548
Victory Horse Show #2	7/15/2016	7/17/2016	3	129	387
Robin Serfass/Victory III	8/5/2016	8/7/2016	3	160	480
Blenheim Summer Classic	8/15/2016	8/22/2016	8	491	3,928
Rancho Mission Viejo Rodeo*	8/22/2016	9/7/2016	2*	500	1,000
Victory Horse Show #4	9/9/2016	9/11/2016	3	105	315
Blenheim Fall Tournament	9/12/2016	9/19/2016	8	649	5,192
Blenheim Int. Jumping Festival	9/19/2016	9/26/2016	8	456	8,208
Victory Horse Show 5	9/30/2016	10/2/2016	3	83	249
Orange County Horse Show Association (OCHSA Finals)	10/10/2016	10/17/2016	8	235	1,880
OC Interscholastic Equest. League (IEL 1&2)	10/28/2016	10/30/2016	3	93	279
OC Interscholastic Equest. League (IEL 3&4)	11/18/2016	11/20/2016	3	85	255
OC Interscholastic Equest. League (IEL 5&6)	12/2/2016	12/4/2016	3	89	267
Anticipated Incidental Layover Stall Rentals			330	15	4,950
Total					66,927

Notes to Table 3-2. The Rancho Mission Viejo Rodeo is seventeen (17) days in duration to allow for stages, arenas, and other structural set ups. The actual number of days in which animals are present is two (2) days.

VI. Description of Management Measures and Best Management Practices

The pollutants of concern in the discharges to waters of the State are pathogens, coliform bacteria, nitrogen, and phosphorus. The Riding Park does not have activities or pollutant sources that generate organochlorine pesticides (DDE) or Selenium and the Riding Park is not a source of these pollutants. Toxicity is a surface water related issue in regards to the 303(d) listing for San Juan Creek and the Riding Park's discharges to the water of State are not relevant to the Toxicity listing.

The following sections describe the management measures (MM) and best management practices (BMP) intended to control and minimize the discharge of pathogens, coliform bacteria, nitrogen, and phosphorus. The following section focuses on MM/BMP measures for pathogens and coliform bacteria, but the MM/BMP measures are intended to equally apply to the other pollutants of concern listed in the preceding section.

a) Equine MM and BMPs

Equine related pollutant generating activities are limited to the Stables and the Exhibition Arena. The Exhibition Arena provide a location for shows and community events. Animal waste generated within the Exhibition Arena are removed immediately and the Riding Park does not hold events on rainy days. The information provided in this section of the application is in regards to the Stable area which is the primary pollutant generating area.

i. Equine Manure Management.

Equine manure management measures implemented for the Riding Park includes several practices which are:

- Manure and urine waste generated within the stalls are combined with bedding material to absorb the fluids created by the animals,
- Stalls are routinely mucked during events and generated waste are temporarily stored in metal roll-away bins provided by a locally contracted solid waste hauler, and
- The Riding Park maintains extra bins at all times to avoid overfilling and to provide waste collection bins at multiple locations throughout the park to help visitors avoid spilling waste on the ground.

An example of the metal construction based roll-away bins provided by CR&R solid waste management services is shown in the Figure 3-1w.

Figure 3-1. Example of Covered Roll-Away Temporary Storage Bin for Manure Management.



Note ramp at front indicating bins is elevated above the ground.

The contracted waste hauling service removes filled bins on an as-needed basis during events or the service will remove filled bins on an approximately seven (7) to fourteen (14) day rotation schedule, depending on the anticipated need for near-future events.

Equine manure waste generated during the storm season (October 1 to April 30) are stored in the roll-away bins that includes a plastic non-permeable cover. An example of a covered waste storage bins is shown in Figure 3-2.

Figure 3-2. Example of a Covered Roll-Away Temporary Manure Storage Bin during the Storm Season.



Storm event produced runoff flows paths observed at the Riding Park (see Section IV.b.ii) and filled temporary storage bins are located more than 100 linear feet from the nearest surface water body.

b) Equine-Related Non-Stormwater and Stormwater Best Management Practices.

i. Equine-Related Non-Stormwater BMPs.

The equine-related non-stormwater discharge elimination procedures implemented at the Riding Park focuses on best management practices for the wash racks. The implementation plan for the wash racks includes a plan for short-term and long-term structural BMPs.

An example of the equestrian facility wash racks is shown below in Figure 3-3.

Figure 3-3. Example of the Equine Wash Racks located at the RMV Riding Park.



The short-term BMP plan for managing non-stormwater discharges from the wash rack focuses on installation of 3,000 gallon storage tanks located at each wash station. The temporary storage tanks will be connected to the wash rack drainage inlets and wastewater generated onsite will be disposed into the sanitary sewer or re-applied onsite for dust control following treatment. Additional details on the design and operation of the wash rack holding tanks is provided in Attachment 2.

In the fall of 2017, the City of San Juan Capistrano intends to begin construction of a long-term structural BMP for capture wash rack discharges. The City of San Juan Capistrano Utilities Division is in the planning phases of a capital project to construct and install a sanitary sewer collection system pipeline on the Riding Park grounds. Wastewater flows generated within the Riding Park, including the wash racks, will be permanently routed into the City's sanitary sewer system once the pipeline construction project is completed. The temporary holding tanks will continue to be used for managing wash rack discharges until such time that the sanitary sewer connection is established.

ii. Equine-Related Stormwater Best Management Practices

A series of photographs shown in Figure 3-4 to 3-6 document the wet weather runoff patterns for the Riding Park.

Stables are covered to direct precipitation away from horses and to exclude precipitation from the stalls to eliminated potential discharges of manure. Earthen berms constructed along the foundation were designed to keep water out the stalls and to prevent potential stormwater related discharges of pathogens and coliform bacteria.

Stormwater runoff generated as a result of precipitation within the Stable area of the Riding Park either infiltrates into soil around the stables or excess runoff is directed towards the Multi-Sport Field as indicated by the photographs shown in Figure 3-4 to Figure 3-6.

Figure 3-4. Example of the RMV Riding Park Stables and Stormwater Runoff Control Practices. Earthen berms at the base of stable structures were installed to prohibit runoff from entering the stalls.



Figure 3-5. Example of the Riding Park Stables and Stormwater Runoff Control Practices.



Figure 3-6. Example of the Riding Park Stables and Stormwater Runoff Management Practices.



Stormwater runoff collected within the Stable area between the stalls and San Juan Creek pools along the building structures and flows laterally towards the east and west end of the property as indicated in Figure 3-7.

The stable area currently has limited capacity to accommodate excess runoff as a result of high intensity rainfall or storm events persisting for an extended amount of time.

Beginning in the fall of 2017, the City of San Juan Capistrano intends to begin construction on the East Trail Extension Project. The purpose of the East Trail extension project is to provide a recreational trail for pedestrian, bicycle, and equestrian users. The trail extension design includes the construction and installation of stormwater capture and reuse swales and infiltration wells. The stormwater BMP features are presented in detail in Attachment 3.

The new trail through the Riding Park will include a Low Impact Development design consisting of a series of new drainage inlets connected to infiltration wells. Technical details on the East Trail Extension Project LID elements are provided in Attachment 3. The Riding Park stormwater capture and reuse system is designed to accommodate up to the 25-year storm event.

iii. Stormwater BMP Effectiveness Inspections.

Rainfall totals recorded during fiscal years 2014-2015 and 2015-2016 led to below-average rainfall amounts and the storm events during those years did not produce a substantial amount of runoff within the Riding Park and similar open space properties within the City of San Juan Capistrano's jurisdiction.

The 2016-2017 fiscal year rainfall total is currently greater than the previous two years and the increased amount of precipitation and duration of the storm events will provide additional opportunities to inspect and evaluation stormwater runoff patterns within the Riding Park. The information gathered from these ongoing inspections are helping to continue assessing drainage pathways and can be used to evaluate the effectiveness of the new stormwater capture and infiltration system constructed during calendar year 2017.

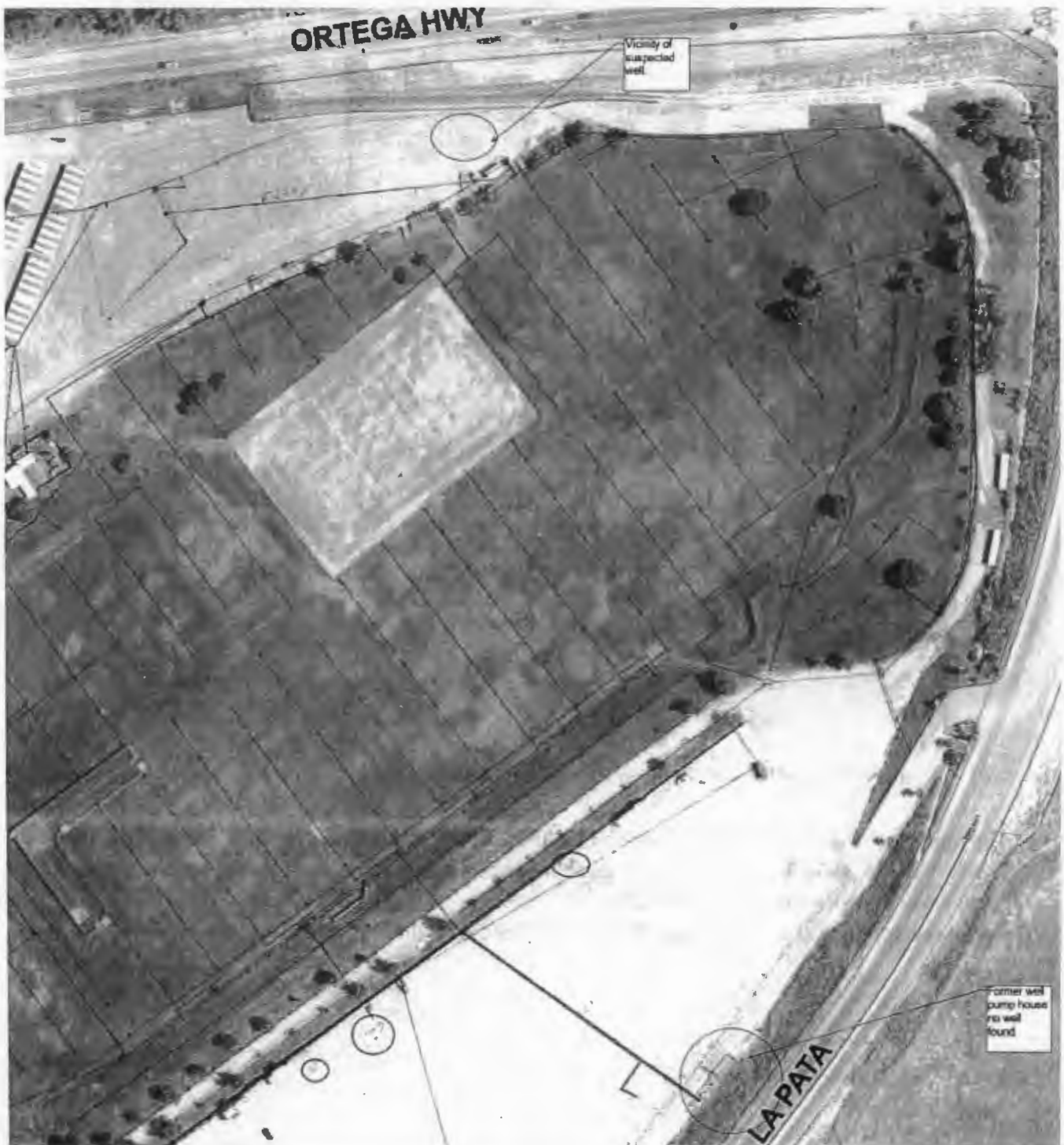
Figure 3-7. Stormwater Drainage Pathways for Precipitation Accumulated at the Stables near San Juan Creek.



iv. Municipal Water Supply Wells in Vicinity of the Riding Park.

The municipal water supply wells believed to have existed, or that were previously located within the Riding Park are shown in Figure 3-8. A location suspected of having a well is shown at the top of the map. No well structure has been located to date. A former well, shown at the bottom of the map, appears to have been removed and no physical structure is located at that site presently.

Figure 3-8. Water Supply Well Location Map in the Vicinity of the Riding Park.



Note on Figure 3-8. Red lines on map indicate location of water supply system pipes.

b) Human-Associated Waste MM and BMPs

i. Onsite waste generation.

The onsite office complex includes restroom facilities for staff. Currently, wastewater flows generated from the office are held in an underground storage tank and BFM has contracted an outside professional service provider to maintain the wastewater tank. Tank pumping services are performed twice per week by the contracted services to ensure the holding tank does not exceed the design capacity.

The City of San Juan Capistrano Utilities Department is currently in the planning phases of a capital project to construct and install a sanitary sewer collection system pipeline on the Riding Park grounds. Wastewater flows generated within the Riding Park will be permanently routed into the City's sanitary sewer system.

ii. Event-based waste generation.

The public who attend the Riding Park events are provided portable toilets as shown in Figure 3-9. Contracted services provide portable toilets on an as-needed basis and the number of individual structures depends on the size and duration of the event. Pumping services are provided throughout an event to ensure the holding tanks do not exceed the design capacity and the portable restroom facilities are removed at the completion of the event.

Figure 3-9. Example of Portable Toilet and a Spill Prevention BMPs.



Additional control measures for managing non-stormwater related issues from portable toilets includes locating restroom facilities on the perimeter of the multi-sport and parking lot grass fields to direct potential spills and leaks into vegetated areas, and to prevent discharges onto impermeable surfaces.

The City of San Juan Capistrano Municipal Code 3-3.553(f) prohibits extended stays of campers and camper trailers. Overnight accommodations for the public participating in the equestrian events is limited to 10 days and patrols are conducted by the City of San Juan Capistrano Code Compliance Officers to ensure visitors maintain compliance with the local ordinance. The Riding Park does not provide an onsite sanitary sewer pump-out service for the camper and camper trailer sanitary sewer tanks.

Attachment 1.

Blenheim Facility Management Event Schedule

For the

2016 and 2017 Calendar Years

Table A1-1. 2016 Blenheim Facility Management Event Schedule

2016	MOVE IN	EVENT DATES	MOVE OUT	EVENTS:	AREA STATUS:	
				*Equestrian, *Tournament Dates (Sports), *Community Event	GRASS FIELDS	SAND RINGS
January		Jan 1-2			GRASS Fields Maintenance	
	9-Jan	Jan 9 (Sat.)	9-Jan	EQUESTRIAN: EquiSports - No Show	GRASS Fields Maintenance	Sand Rings: Olympic Ring & Hunter 1
	15-Jan	Jan 16-17	17-Jan	EQUESTRIAN: Orange County Interscholastic Eq League (IEL 7&8)	GRASS Fields Maintenance	All Sand Rings
		Jan 23-24			GRASS Fields Maintenance	
		Jan 30-31			GRASS Fields Maintenance	
February		Feb 6-7			GRASS Fields Maintenance	
	13-Feb	Feb 13-14	16-Feb		GRASS Fields Maintenance	
	20-Feb	20-Feb	20-Feb	EQUESTRIAN: EquiSports - No Show	GRASS Fields Maintenance / Rest	Sand Rings: Olympic Ring & Hunter 1
		Feb 27-28			GRASS Fields Maintenance / Rest	
March		Mar 5-6			GRASS Fields Maintenance / Rest	
		Mar 12-13			GRASS Fields Maintenance / Rest	
		Mar 19-20			GRASS Fields Maintenance / Rest	
Easter Sun. 3/27	21-Mar	Mar 22-26	28-Mar	EQUESTRIAN: Blenheim Spring Fling	All Grass Rings	All Sand Rings
	28-Mar	Mar 30-Apr 3	4-Apr	EQUESTRIAN: Blenheim Spring Classic I	All Grass Rings	All Sand Rings
	29-Mar	Mar 31-Apr 2	2-Apr	EQUESTRIAN: Dressage - Festival of the Horse	Shared Event - see above	Sand Rings: Olympic, Hunter II, Edison

Table A1-1. 2016 Blenheim Facility Management Event Schedule

2016	MOVE IN	EVENT DATES	MOVE OUT	EVENTS:	AREA STATUS:	
				*Equestrian, *Tournament Dates (Sports), *Community Event	GRASS FIELDS	SAND RINGS
April		Mar 30-Apr 3	4-Apr	EQUESTRIAN: Blenheim Spring Classic I	All Grass Rings	All Sand Rings
		Mar 31-Apr 2	2-Apr	EQUESTRIAN: Dressage - Festival of the Horse	Shared Event - see above	Sand Rings: Olympic, Hunter II, Edison
	4-Apr	April 6-10	11-Apr	EQUESTRIAN: Blenheim Spring Classic II	All Grass Rings	All Sand Rings
	11-Apr	April 13-17	18-Apr	EQUESTRIAN: Blenheim Spring Classic III	All Grass Rings	All Sand Rings
		Apr 23-24			GRASS Fields Maintenance	
		Apr 30-May 1			GRASS Fields Maintenance	
May		Apr 30-May 1			GRASS Fields Maintenance	
		May 7-8			GRASS Fields Maintenance	
		May 14-15			GRASS Fields Maintenance	
	20-May	May 21-22	22-May	EQUESTRIAN: Victory Horse Show 1	GRASS Fields Maintenance / Rest	All Sand Rings
		May 28-29			GRASS Fields Maintenance / Rest	
June	1-Jun	June 2-5	6-Jun	EQUESTRIAN: Blenheim June Jamboree	All Grass Rings	All Sand Rings
	6-Jun	June 8-12	13-Jun	EQUESTRIAN: Blenheim June Classic I	All Grass Rings	All Sand Rings
	13-Jun	June 15-19	20-Jun	EQUESTRIAN: Blenheim June Classic II	All Grass Rings	All Sand Rings
	20-Jun	June 22-26	27-Jun	EQUESTRIAN: Blenheim June Classic III	All Grass Rings	All Sand Rings
Holiday: July 4th	27-Jun	Jun 29-July 3	5-Jul	EQUESTRIAN: Blenheim Red White & Blue Classic	All Grass Rings	All Sand Rings

Table A1-1. 2016 Blenheim Facility Management Event Schedule

2016	MOVE IN	EVENT DATES	MOVE OUT	EVENTS:	AREA STATUS:	
				*Equestrian, *Tournament Dates (Sports), *Community Event	GRASS FIELDS	SAND RINGS
July		6/29 - July 3		EQUESTRIAN: Blenheim Red White & Blue	All Grass Rings	All Sand Rings
		July 9-10			GRASS Fields Rest	
	15-Jul	July 16-17	17-Jul	TOURNAMENT DATES: Slammer's Soccer	Shared Event Dates - see below	
	15-Jul	July 16-17	17-Jul	EQUESTRIAN: Victory Horse Show 2	Shared Event Dates	All Sand Rings
	22-Jul	July 23-24	24-Jul	TOURNAMENT DATES: Pat's Cup Soccer		
		July 30-31			Not Available Event Below	
		July 29 (pm), July 30		COMMUNITY EVENT: Two- Stepping Under the Stars	<u>Kids Day</u> <u>Area/Grass Field:</u> (7/29 - Sponsor Appreciation) (7/30 - Community Event Day)	
August	5-Jul	Aug 6-7	7-Aug	EQUESTRIAN: Robin Serfass	Grass Field: (1) Grass Ring	All Sand Rings
	15-Aug	Aug 17-21	22-Aug	EQUESTRIAN: Blenheim Summer Classic	All Grass Rings	All Sand Rings
	22-Aug	Aug 27- 28	2-Sep	COMMUNITY EVENT: Rancho Mission Viejo Rodeo	All Grass Field	Not Available
Septemb er	2-Sep	Sept 3-4			GRASS Fields Rest	
	9-Sep	Sept 10-11	11-Sep	EQUESTRIAN: Victory Horse Show 4	GRASS Fields Rest	All Sand Rings
	12-Sep	Sept 14-18	19-Sep	EQUESTRIAN: Blenheim Fall Tournament	All Grass Rings	All Sand Rings
	19-Sep	Sept 21-25	26-Sep	EQUESTRIAN: Blenheim Int. Jumping Festival	All Grass Rings	All Sand Rings

Table A1-1. 2016 Blenheim Facility Management Event Schedule

2016	MOVE IN	EVENT DATES	MOVE OUT	EVENTS:	AREA STATUS:	
				*Equestrian, *Tournament Dates (Sports), *Community Event	GRASS FIELDS	SAND RINGS
October	30-Sep	Oct 1-2	3-Oct	TOURNAMENT DATES: SCDSL Soccer	Shared Event Dates - see below	All Sand Rings
	30-Sep	Oct 1-2	2-Oct	EQUESTRIAN: Victory Horse Show 5		All Sand Rings
	7-Oct	Oct 8-9	10-Oct	TOURNAMENT DATES: SCDSL Soccer		
	14-Oct	Oct 15-16	13-Oct	TOURNAMENT DATES: SCDSL Soccer		All Sand Rings
	10/10 & 10/11 Warmup	Oct 12-16	17-Oct	EQUESTRIAN: Orange County Horse Show Association (OCHSA Finals)	Shared Event Dates - see above	All Sand Rings
	21-Oct	Oct 22-23	24-Oct	TOURNAMENT DATES: SCDSL Soccer		All Sand Rings
	28-Oct	Oct 29-30	31-Oct	TOURNAMENT DATES: SCDSL Soccer		
	28-Oct	Oct 29-30	30-Oct	EQUESTRIAN: IEL 1 & 2	Shared Event Dates - see above	All Sand Rings
November	4-Nov	Nov 5-6	7-Nov	TOURNAMENT DATES: SCDSL Soccer		
	11-Nov	Nov 12-13	14-Nov	TOURNAMENT DATES: SCDSL Soccer		
	18-Nov	Nov 19-20	21-Nov	TOURNAMENT DATES: SCDSL Soccer		
Thanksgiving 11/24		Nov 26-27				
December	2-Dec	Dec 3-4	5-Dec	TOURNAMENT DATES: SCDSL Soccer		All Sand Rings
Last Weekend Soccer	9-Dec	Dec 10-11	13-Dec	TOURNAMENT DATES: Albion OC		

Table A1-1. 2016 Blenheim Facility Management Event Schedule

2016	MOVE IN	EVENT DATES	MOVE OUT	EVENTS:	AREA STATUS:	
				*Equestrian, *Tournament Dates (Sports), *Community Event	GRASS FIELDS	SAND RINGS
can take place.						
		Dec 17-18			GRASS Fields Maintenance / Rest	
		Dec 24-25			GRASS Fields Maintenance / Rest	

The 2016 event schedule provided in this attachment is representative of events on an annual basis, and the calendar year 2017 schedule will be similar in terms of number of events and the type of activities that will occur during those times.

Table A1-2. 2017 Blenheim Facility Management Event Schedule

2017	MOVE IN	EVENT DATES	MOVE OUT	EVENTS:	AREA STATUS:	
				*Equestrian, *Tournament Dates (Soccer), *Community Event	GRASS FIELDS	SAND RINGS
January		Jan 7-8			GRASS Fields Maintenance	
Cancelled due to rain forecast		Jan 14-15		EQUESTRIAN: Orange County Interscholastic Eq League (IEL 3&4)	GRASS Fields Maintenance	Cancelled
Cancel due to rain forecast		21-Jan		No Show	GRASS Fields Maintenance	Cancelled
Relocate d off-site due to rain forecast		22-Jan		LART DRILL (City of SJC)	GRASS Fields Maintenance	Cancelled
	27-Jan	Jan 28-29	29-Jan	EQUESTRIAN: Orange County Interscholastic Eq League (IEL 3&4)	GRASS Fields Maintenance	All Sand Rings
February		Feb 4-5		No-Show - RAIN DATE	GRASS Fields Maintenance	
		Feb 11-12		EQUESTRIAN: Orange County Interscholastic Eq League (IEL 5&6)	GRASS Fields Maintenance	

Table A1-2. 2017 Blenheim Facility Management Event Schedule

2017	MOVE IN	EVENT DATES	MOVE OUT	EVENTS:	AREA STATUS:	
				*Equestrian, *Tournament Dates (Soccer), *Community Event	GRASS FIELDS	SAND RINGS
		Feb 18-19			GRASS Fields Maintenance / Rest	
		Feb 25-26			GRASS Fields Maintenance / Rest	
March	3-Mar	Mar 4-5	5-Mar	EQUESTRIAN: Orange County Interscholastic Eq League (IEL 7&8)	GRASS Fields Maintenance / Rest	All Sand Rings
		Mar 11-12			GRASS Fields Maintenance / Rest	
		Mar 18-19			GRASS Fields Maintenance / Rest	
	21-Mar	Mar 22-26	27-Mar	EQUESTRIAN: Blenheim Spring Classic I	All Grass Rings	All Sand Rings
	21-Mar	Mar 23-26	26-Mar	EQUESTRIAN: Dressage / Festival of the Horse	Shared Event Dates - see above	All Sand Rings
	28-Mar	Mar 29-Apr 2	3-Apr	EQUESTRIAN: Blenheim Spring Classic II	All Grass Rings	All Sand Rings
April		Mar 29-Apr 2	4-Apr	EQUESTRIAN: Blenheim Spring Classic II	All Grass Rings	All Sand Rings
	3-Apr	April 5-9	10-Apr	EQUESTRIAN: Blenheim Spring Classic III	All Grass Rings	All Sand Rings

Table A1-2. 2017 Blenheim Facility Management Event Schedule

2017	MOVE IN	EVENT DATES	MOVE OUT	EVENTS:	AREA STATUS:	
				*Equestrian, *Tournament Dates (Soccer), *Community Event	GRASS FIELDS	SAND RINGS
Easter Sun. 4/16	10-Apr	April 11-15	16-Apr	EQUESTRIAN: Blenheim Spring Classic IV	All Grass Rings	All Sand Rings
		Apr 22-23			GRASS Fields Maintenance	
		Apr 29-30			GRASS Fields Maintenance	
May		May 6-7			GRASS Fields Maintenance	
		May 13-14			GRASS Fields Maintenance	
	19-May	May 20-21	22-May	EQUESTRIAN: Victory Horse Show 1	GRASS Fields Maintenance / Rest	All Sand Rings
		May 27-28			GRASS Fields Maintenance / Rest	
June	5/29 (May)	June 1-4	5-Jun	EQUESTRIAN: Blenheim June Jamboree	All Grass Rings	All Sand Rings
	6-Jun	June 7-11	12-Jun	EQUESTRIAN: Blenheim June Classic I	All Grass Rings	All Sand Rings
	13-Jun	June 14-18	29-Jun	EQUESTRIAN: Blenheim June Classic II	All Grass Rings	All Sand Rings
	20-Jun	June 21-25	26-Jun	EQUESTRIAN: Blenheim June Classic III	All Grass Rings	All Sand Rings
Holiday: July 4th	27-Jun	Jun 28-July 2	3-Jul	EQUEST: Blenheim Red White & Blue Classic	All Grass Rings	All Sand Rings
July		6/28 - July 2	3-Jul	EQUESTRIAN: Blenheim Red, White & Blue	All Grass Rings	All Sand Rings
	7-Jul	July 8-9	9-Jul	EQUESTRIAN: Victory Horse Show 2	GRASS Fields Maintenance/Rest	
	14-Jul	July 15-16	17-Jul	SOCCER:		
	21-Jul	July 22-23	24-Jul	SOCCER:		

Table A1-2. 2017 Blenheim Facility Management Event Schedule

2017	MOVE IN	EVENT DATES	MOVE OUT	EVENTS:	AREA STATUS:	
				*Equestrian, *Tournament Dates (Soccer), *Community Event	GRASS FIELDS	SAND RINGS
		July 29-30			(Event Listed Below)	
		July 28 (pm), July 29		COMMUNITY EVENT: Two-Stepping Under the Stars	Kids Day Area/Grass Field: (7/28 - Sponsor Appreciation) (7/29 - Community Event Day)	
August	4-Jul	Aug 5-6	6-Aug	EQUESTRIAN: Robin Serfass (Victory 3)	Grass Field: (1) Grass Ring	All Sand Rings
		Aug 12-13			GRASS Fields Rest	
	14-Aug	Aug 16-20	21-Aug	EQUESTRIAN: Blenheim Summer Classic	All Grass Rings	All Sand Rings
	21-Aug	Aug 26-27	6-Sep	COMMUNITY EVENT: Rancho Mission Viejo Rodeo	All Grass Field	Not Available
September		Sept 2-3			GRASS Fields Maintenance - following Rodeo Use.	

Table A1-2. 2017 Blenheim Facility Management Event Schedule

2017	MOVE IN	EVENT DATES	MOVE OUT	EVENTS:	AREA STATUS:	
				*Equestrian, *Tournament Dates (Soccer), *Community Event	GRASS FIELDS	SAND RINGS
	8-Sep	Sept 9-10	10-Sep	EQUESTRIAN: Victory Horse Show 4	GRASS Fields Rest	All Sand Rings
	11-Sep	Sept 13-17	18-Sep	EQUESTRIAN: Blenheim Fall Tournament	All Grass Rings	All Sand Rings
	18-Sep	Sept 20-24	25-Sep	EQUESTRIAN: Blenheim Int. Jumping Festival	All Grass Rings	All Sand Rings
		Sept 30 - Oct 1			GRASS Fields Maintenance	
October	6-Oct	Oct 7-8	9-Oct	SOCCER:		
	6-Oct	Oct 7-8	8-Oct	EQUESTRIAN: IEL 1 & 2		All Sand Rings
	13-Oct	Oct 14-15	16-Oct	SOCCER:	Shared Event Dates - see below	All Sand Rings
		Oct 14-15		EQUESTRIAN: Victory Horse Show 5		All Sand Rings
	20-Oct	Oct 21-22	23-Oct	SOCCER:		
		Oct 21-22				
	10/23 & 10/24 Warmup	Oct 25-29	29-Oct	EQUESTRIAN: Orange County Horse Show Association (OCHSA Finals)	Shared Event Dates - see below	All Sand Rings

Table A1-2. 2017 Blenheim Facility Management Event Schedule

2017	MOVE IN	EVENT DATES	MOVE OUT	EVENTS:	AREA STATUS:	
				*Equestrian, *Tournament Dates (Soccer), *Community Event	GRASS FIELDS	SAND RINGS
	27-Oct	Oct 28-29	30-Oct	SOCCER:		All Sand Rings
November	3-Nov	Nov 4-5	6-Nov	SOCCER:		
		Nov 4-5		EQUESTRIAN: IEL 3 & 4		All Sand Rings
	10-Nov	Nov 11-12	13-Nov	SOCCER:		
		Nov 11-12				
	17-Nov	Nov 18-19	20-Nov	SOCCER:		
		Nov 18-19				
3-Day Tournament	11/22 (23rd: Thanks giving)	Nov 24-26	27-Nov	SOCCER:		
		Nov 25-26				
December	1-Dec	Dec 2-3	4-Dec	SOCCER:		All Sand Rings
	1-Dec	Dec 2-3	3-Dec	EQUESTRIAN: IEL 5 & 6	Shared Event Dates - see above	All Sand Rings
	8-Dec	Dec 9-10	11-Dec	SOCCER:		
		Dec 16-17			GRASS Fields Maintenance / Rest	
Event Schedule Subject to Change.						

Attachment 2.

Short-Term Non-Stormwater BMP Implementation Plan

For the

RMV Riding Park Equine Wash Racks



1062 Calle Negocio #F, San Clemente CA 92673
Visit us on the Web: www.ScottEnvironmental.com

Non-Stormwater Runoff Best Management Plan

for the

Equestrian Facility Wash Racks

at the

Rancho Mission Viejo Riding Park at San Juan Capistrano

The following Best Management Practice (BMP) Plan provides an overview of the wash rack pollution prevention measures that will be implemented at the Rancho Mission Viejo Riding Park to eliminate non-stormwater discharges into San Juan Creek. The wash racks generate dry weather condition related runoff from the bathing of horses by the animal's owners and their staff.

The information presented on the following pages of this document describes the implementation of holding tanks for containment wash racks discharge. The holding tanks are designed to be short-term BMPs during the interim period until a connection to the sanitary sewer system can be completed to each wash rack.

These structural BMPs are implemented to meet with the requirements specified in the municipal separate storm sewer system (MS4) permit Order number (No.) R9-2015-0100 issued by the San Diego Regional Water Quality Control Board and non-stormwater discharge prohibitions specified by *Conditional Waivers of Waste Discharge Requirements for Low Threat Discharges in the San Diego Region* (Order No. R9-2014-0041).

Scott Environmental Health & Safety Services

Phone: 949-454-1625 Fax: 949-454-1636 Email: Support@ScottEnvironmental.com



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Holding Tanks and the Recycling of Wastewater

The structural BMP plan for each wash rack consists of a 3,000 gallon Noresco (manufacturer part number 40635) holding tank connected to the drainage inlets. The water will be pumped into each holding tank by a sump pump. A holding tank will be placed at the end of each of the wash racks and can contain 3,000 gallons of water. The necessity of such a large holding tank is due to the random use of wash racks. The most conveniently located wash rack may use up to 1,700 gallons of water while another wash rack may use only 300 gallons of water. The holding tanks need to be able to hold the maximum amount of water used at any one wash rack. In addition, runoff generated on the wash rack concrete surface, as a result of incidental storm event related conditions will be added to the total amount of water in each of the holding tanks.

The holding tank water will be disinfected and used for dust control at the Riding Park following the disinfection process described in the following section.



Disinfection Process

The wash water disinfection process consists of adding a 12% chlorine solution (2 gallons) to each water tank. The chlorine will be stored in a shed because it is a hazardous material. As each tank is filled with wastewater from the wash rack, residual Chlorine will be left in the water. Before the resulting treated

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water is used for dust control on the property, a Chlorine residual test kit will be used to verify the residual chlorine concentration and to determine whether the concentration is present at a level that will not harm surrounding vegetation. This test kit will be used in every 1 of 5 truckloads of water.

Tank Water Level Monitoring Procedures:

The water level will be monitored by checking the tank gauge daily every 1-2 hours during business hours. Each tank is fitted with a float valve switch that turns off the electric sump pump to prevent overtopping. The water will be also get pumped out of each tank when the water level reaches approximately 2,000 gallons.

Tank System Maintenance:

The holding tanks are HDPE (high density polyethylene), and will not corrode. Every six months, or as needed, the tanks will be cleaned and rinsed out per the manufacturers specifications. Solids and/or accumulated bacteria will be removed from the interior & bottom of each tank. The isolation valves will be inspected, adjusted and/or replaced as needed. The pumps will be maintained per the manufacturers specifications.

Schedule of Operation:

The holding tanks are anticipated to be used as a non-stormwater discharge containment system from March 2017 to December 2017, or until the sanitary sewer system construction project is completed.

Attachment 3.
Stormwater Capture and Reuse System
For the
San Juan Capistrano East Trail Expansion Project

San Juan Creek Rd

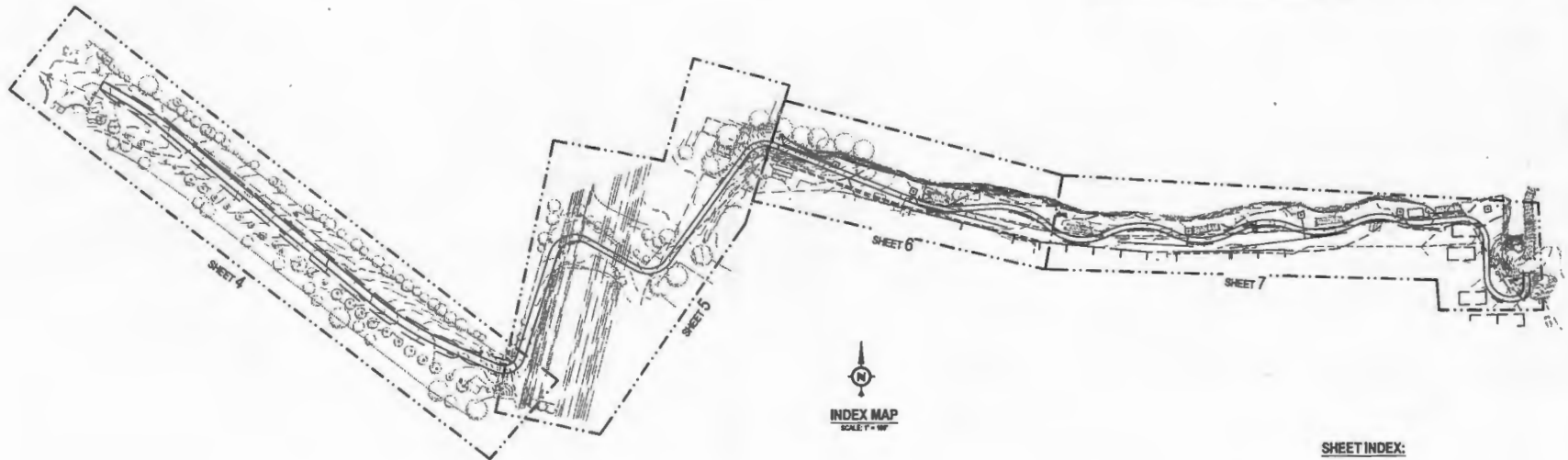
Alhambra River

Ortega Hwy

La Puente Ave

PROJECT LOCATION

VICINITY MAP
SCALE 1" = 1000'



1- TITLE SHEET
2- SECTIONS AND DETAILS
3- GENERAL NOTES
4- TRAIL IMPROVEMENTS
5- TRAIL IMPROVEMENTS
6- TRAIL IMPROVEMENTS
7- TRAIL IMPROVEMENTS

BAISIS OF ELEVATION:
 CHARGE COUNTY SURVEY BENCHMARK DESIGNATION 24-75-26, DESCRIBED BY OCS AS BEING
 FOUND 3' IN OCS ALUMINUM BENCHMARK DISC STAMPED "24-75-26" LOCATED ON
 THE TOP OF THE BRIDGE DECK ALONG THE EASTBOUND LANE OF ORTEGA
 HIGHWAY. MOVEMENT IS LOCATED NEAR 1700 + FROM ITS INTERSECTION WITH
 ANTIPOYR, SET IN THE NORTH END OF THE EASTBOUND FOOTING OF BRIDGE
 ON SAN ANTONIO CREEK, SET ON THE TOP OF THE BRIDGE DECK, 1 FT. SOUTHERLY
 OF THE 1714 FT. HIGH NORTH WALL, AND 34 FT. WESTERLY OF THE EASTERLY END OF
 SAID WALL.
 ELEVATION 1715.142 FEET (NAVD83).

RECOMMENDED FOR APPROVAL BY: _____		DATE: _____
APPROVED BY: _____		DATE: _____
DESIGN ALLIANCE CITY ENGINEER		
CITY OF SAN JUAN CAPISTRANO		JOB No. 16091 Drawing No. Sheet 1 of 7
TITLE SHEET		

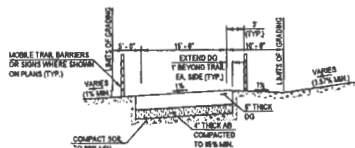


PLANS PREPARED FOR:

**THE CITY OF SAN JUAN
CAPISTRANO**

32409 PASEO ADELANTO
SAN JUAN CAPISTRANO, CA 92675
CONTACT PERSON: JOE MARKUSICH
ASSOCIATE ENGINEER (949) 487-4313

[illegible]



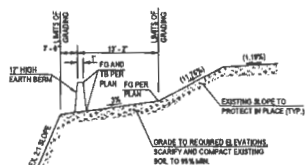
SECTION A-A

SCALE: 1" = 10' HORIZ.
1" = 2' VERT.



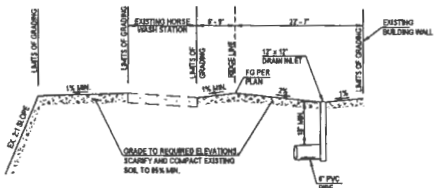
SECTION B-B

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1" = 2' VERT.



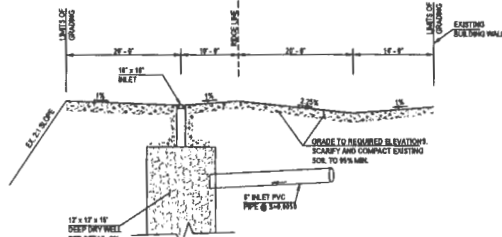
SECTION C-C

SCALE: 1" = 10' HORIZ.
1" = 2' VERT.



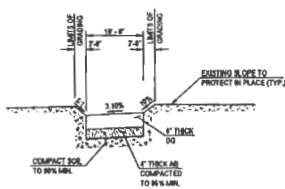
SECTION D-D

SCALE: 1" = 10' HORIZ.
1" = 2' VERT.



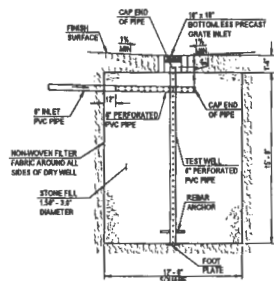
SECTION E-E

SCALE: 1" = 10' HORIZ.
1" = 2' VERT.



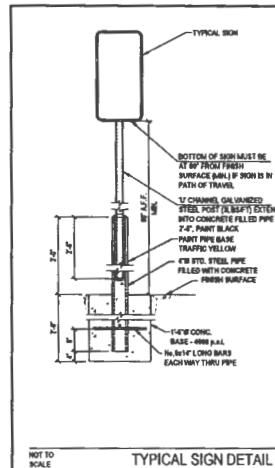
SECTION F-F

SCALE: 1" = 10' HORIZ.
1" = 2' VERT.

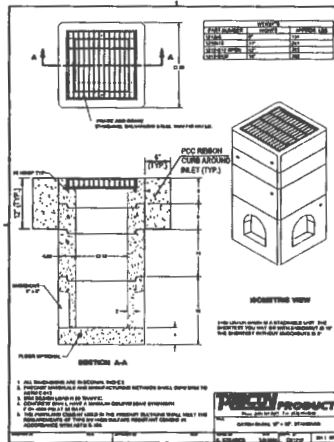


DRY WELL DETAIL

SCALE: 1" = 2'



TYPICAL SIGN DETAIL



TYPICAL INLET DETAIL

NO SCALE

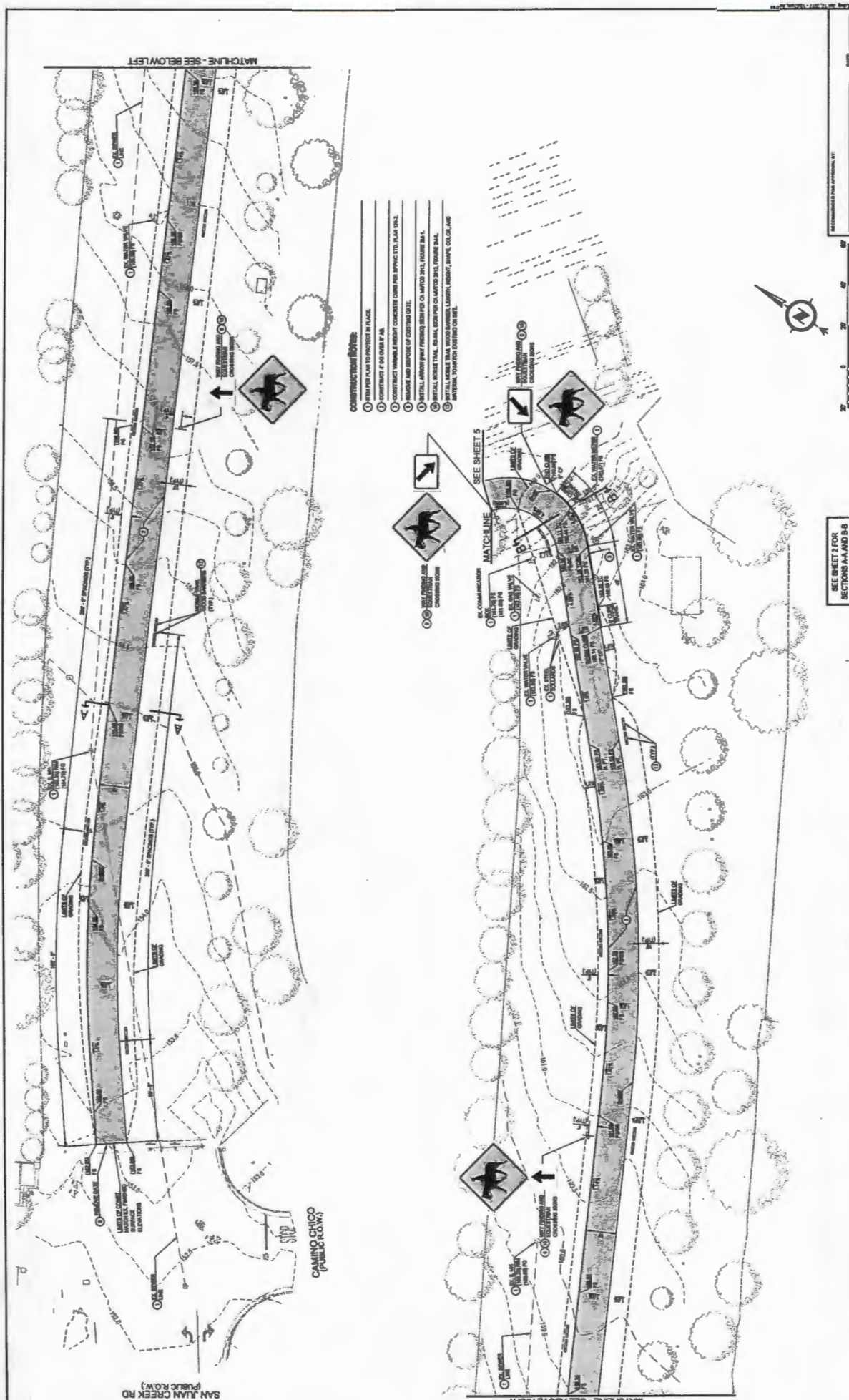
CONSTRUCTION NOTES:	QUANTITY
1. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	368
2. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	17,840-39
3. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	111.7
4. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	847.47
5. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	1 EA
6. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	1 EA
7. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	4 EA
8. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	11.8
9. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	35 EA
10. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	39 EA
11. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	7 EA
12. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	3 EA
13. CONSTRUCT 12" x 12" PRECAST CONCRETE CURB PER SPVNC STD. PLAN 176-2.	134 EA



PLANS PREPARED FOR
THE CITY OF SAN JUAN
CAPISTRANO
SARNO PABLO ADELANTO
SAN JUAN CAPISTRANO, CA 92025
CONTACT PERSON: JOSE MARRASCH
ASSOCIATE ENGINEER (P.E.) 467-4315

DESIGNED BY:	ALP
DRAWN BY:	ALP
CHECKED BY:	RAJ
Date:	By:
REVISIONS:	App'd:

RECOMMENDED FOR APPROVAL BY: _____ DATE: _____
APPROVED BY: _____ DATE: _____
JOSE ALVAREZ, CITY ENGINEER
CITY OF SAN JUAN
CAPISTRANO
SECTION 2 OF 7



CONSTRUCTION NOTES:

1. PERMITS FOR PLANT TO BE PLACED IN PLACE.
2. CONSTRUCT 12\"/>

SEE SHEET 2 FOR SECTIONS A-A AND B-B

SCALE: 1" = 20'

THE CITY OF SAN JUAN CARISTRANO
 SAN JUAN CARISTRANO, CALIFORNIA
 ASSOCIATE ENGINEER: [Signature] REG. NO. 474373

APR CONSULTANTS, INC.
 1414 W. 14TH AVENUE, SUITE 100, DENVER, CO 80202
 TEL: 303-733-4226 FAX: 303-733-4227

PROJECT INFORMATION:

PROJECT NO.: 10-000000

DATE: 02/27/2013

PROJECT NAME: SEE TITLE SHEET

APPROVED BY: [Signature]

DATE: 02/27/2013

PROJECT NO.: 10-000000

DATE: 02/27/2013

1. **CONSTITUTIONAL AMEND:**
2. **1** of 10 bills passed by Congress
3. **2** of 3 branches of govt must agree
4. **3** of 4 states must agree
5. **4** of 5 states must agree
6. **5** of 10 states must agree
7. **6** of 12 states must agree
8. **7** of 15 states must agree
9. **8** of 20 states must agree
10. **9** of 25 states must agree
11. **10** of 30 states must agree
12. **11** of 35 states must agree
13. **12** of 40 states must agree
14. **13** of 45 states must agree
15. **14** of 50 states must agree
16. **15** of 55 states must agree
17. **16** of 60 states must agree
18. **17** of 65 states must agree
19. **18** of 70 states must agree
20. **19** of 75 states must agree
21. **20** of 80 states must agree
22. **21** of 85 states must agree
23. **22** of 90 states must agree
24. **23** of 95 states must agree
25. **24** of 100 states must agree
26. **25** of 105 states must agree
27. **26** of 110 states must agree
28. **27** of 115 states must agree
29. **28** of 120 states must agree
30. **29** of 125 states must agree
31. **30** of 130 states must agree
32. **31** of 135 states must agree
33. **32** of 140 states must agree
34. **33** of 145 states must agree
35. **34** of 150 states must agree
36. **35** of 155 states must agree
37. **36** of 160 states must agree
38. **37** of 165 states must agree
39. **38** of 170 states must agree
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47. **46** of 210 states must agree
48. **47** of 215 states must agree
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50. **49** of 225 states must agree
51. **50** of 230 states must agree
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77. **76** of 360 states must agree
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85. **84** of 400 states must agree
86. **85** of 405 states must agree
87. **86** of 410 states must agree
88. **87** of 415 states must agree
89. **88** of 420 states must agree
90. **89** of 425 states must agree
91. **90** of 430 states must agree
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125. **124** of 600 states must agree
126. **125** of 605 states must agree
127. **126** of 610 states must agree
128. **127** of 615 states must agree
129. **128** of 620 states must agree
130. **129** of 625 states must agree
131. **130** of 630 states must agree
132. **131** of 635 states must agree
133. **132** of 640 states must agree
134. **133** of 645 states must agree
135. **134** of 650 states must agree
136. **135** of 655 states must agree
137. **136** of 660 states must agree
138. **137** of 665 states must agree
139. **138** of 670 states must agree
140. **139** of 675 states must agree
141. **140** of 680 states must agree
142. **141** of 685 states must agree
143. **142** of 690 states must agree
144. **143** of 695 states must agree
145. **144** of 700 states must agree
146. **145** of 705 states must agree
147. **146** of 710 states must agree
148. **147** of 715 states must agree
149. **148** of 720 states must agree
150. **149** of 725 states must agree
151. **150** of 730 states must agree
152. **151** of 735 states must agree
153. **152** of 740 states must agree
154. **153** of 745 states must agree
155. **154** of 750 states must agree
156. **155** of 755 states must agree
157. **156** of 760 states must agree
158. **157** of 765 states must agree
159. **158** of 770 states must agree
160. **159** of 775 states must agree
161. **160** of



APD
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WWW.APD-CONSULTING.COM

PROJECT NUMBER: 72 SCALE: AS SHOWN DATE: _____



THE CITY OF SAN JUAN
CAPISTRANO
SAN JUAN, CALIFORNIA
CONTACT PERSON: JIM BARNES
ARCHITECT/ENGINEER (004-42433)

DESIGNED BY: _____
CHECKED BY: _____
DATE: _____

SCALE: 1" = 20'

DATE: _____

PROJECT: _____

TRAIL IMPROVEMENTS

7 of 7

APPROVED BY: _____

DATE: _____

PROJECT: _____

TRAIL IMPROVEMENTS

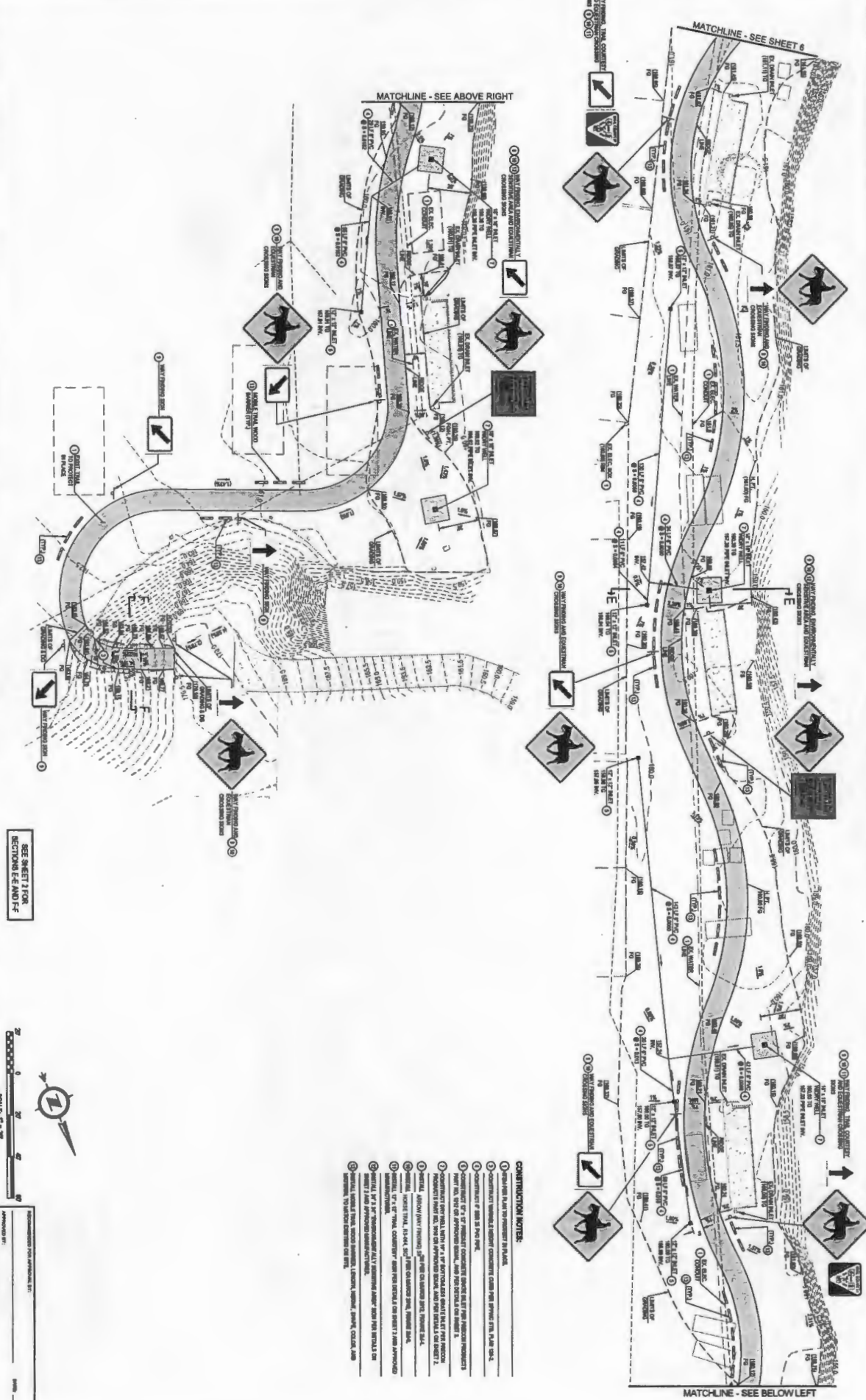
7 of 7

APPROVED BY: _____

DATE: _____

PROJECT: _____

TRAIL IMPROVEMENTS



- CONSTRUCTION NOTES:**
- 1. EXISTING TRAIL TO BE IMPROVED BY 10 FEET.
 - 2. EXISTING TRAIL TO BE IMPROVED BY 10 FEET.
 - 3. EXISTING TRAIL TO BE IMPROVED BY 10 FEET.
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 - 19. EXISTING TRAIL TO BE IMPROVED BY 10 FEET.
 - 20. EXISTING TRAIL TO BE IMPROVED BY 10 FEET.

EXHIBIT B

2016 Events (Table 3-2 of Exhibit A)

Event Title	Number of Event Days	Horses Present
Orange County Interscholastic Eq League	3	76
Blenheim Spring Classic I	8	290
Blenheim Spring Classic II	8	516
Dressage - Festival of the Horse	3	290
Blenheim Spring Classic III	8	766
Blenheim Spring Classic IV	8	704
Victory Horse Show #1	3	186
Blenheim June Classic I	8	810
Blenheim June Classic II	8	719
Blenheim June Classic III	8	612
Blenheim Red White & Blue Classic	7	364
Victory Horse Show #2	3	129
Robin Serfass / Victory III	3	160
Blenheim Summer Classic	8	491
Rancho Mission Viejo Rodeo	2	500
Victory Horse Show #4	3	105
Blenheim Fall Tournament	8	649
Blenheim Int. Jumping Festival	8	456
Victory Horse Show #5	3	83
Orange County Horse Show Association	8	235
OC Interscholastic Equest. League (1&2)	3	39
OC Interscholastic Equest. League (3&4)	3	85
OC Interscholastic Equest. League (5&6)	3	89
Totals:	127	8354

Events Exceeding 500 Horses	Number of Days	Horses Present
Blenheim Spring Classic II	8	516
Blenheim Spring Classic III	8	766
Blenheim Spring Classic IV	8	704
Blenheim June Classic I	8	810
Blenheim June Classic II	8	719
Blenheim June Classic III	8	612
Rancho Mission Viejo Rodeo	2	500
Blenheim Fall Tournament	8	649
Totals:	58	5276

Events Exceeding 150 Horses	Number of Days	Horses Present
Blenheim Spring Classic I	8	290
Blenheim Spring Classic II	8	516
Dressage - Festival of the Horse	3	290
Blenheim Spring Classic III	8	766
Blenheim Spring Classic IV	8	704
Victory Horse Show #1	3	186
Blenheim June Classic I	8	810
Blenheim June Classic II	8	719
Blenheim June Classic III	8	612
Blenheim Red White & Blue Classic	7	364
Victory Horse Show #2	3	129
Robin Serfass / Victory III	3	160
Blenheim Summer Classic	8	491
Rancho Mission Viejo Rodeo	2	500
Blenheim Fall Tournament	8	649
Blenheim Int. Jumping Festival	8	456
Orange County Horse Show Association	8	235
Totals:	109	7877

EXHIBIT C









EXHIBIT D

Santa Ana Rain Station SNA		
Date	Day	Rain Inches
7/13/2012	Friday	0.18
10/11/2012	Thursday	0.18
10/12/2012	Friday	0.17
11/17/2012	Saturday	0.24
11/29/2012	Thursday	0.21
11/30/2012	Friday	0.1
12/3/2012	Monday	0.6
12/13/2012	Thursday	0.54
12/24/2012	Monday	0.55
12/26/2012	Wednesday	0.26
12/30/2012	Sunday	0.13
1/24/2013	Thursday	0.56
1/25/2013	Friday	0.3
1/26/2013	Saturday	0.22
2/9/2013	Saturday	0.18
2/20/2013	Wednesday	0.18
3/8/2013	Friday	0.27
3/9/2013	Saturday	0.12
5/6/2013	Monday	0.35

5/7/2013	Tuesday	0.19
10/10/2013	Thursday	0.24
11/21/2013	Thursday	0.32
11/30/2013	Saturday	0.22
12/8/2013	Sunday	0.27
12/20/2013	Friday	0.16
2/3/2014	Monday	0.12
2/7/2014	Friday	0.11
2/27/2014	Thursday	0.44
2/28/2014	Friday	0.5
3/1/2014	Saturday	1.07
3/2/2014	Sunday	0.33
4/2/2014	Wednesday	0.12
4/26/2014	Saturday	0.22
11/1/2014	Saturday	0.32
12/1/2014	Monday	0.13
12/3/2014	Wednesday	1.05
12/4/2014	Thursday	0.8
12/12/2014	Friday	1.32
12/13/2014	Saturday	0.69
12/17/2014	Wednesday	0.34

12/31/2014	Wednesday	0.12
1/11/2015	Sunday	0.3
1/12/2015	Monday	0.75
1/27/2015	Tuesday	0.12
2/23/2015	Monday	0.52
3/2/2015	Monday	0.19
3/3/2015	Tuesday	0.19
4/8/2015	Wednesday	0.2
5/8/2015	Friday	0.29
5/15/2015	Friday	1.06
5/16/2015	Saturday	0.16
7/19/2015	Sunday	0.19
7/20/2015	Monday	0.25
9/10/2015	Thursday	0.16
9/15/2015	Tuesday	1.27
12/14/2015	Monday	0.2
12/20/2015	Sunday	0.14
12/22/2015	Tuesday	0.27
12/23/2015	Wednesday	0.27
1/6/2016	Wednesday	0.97
1/7/2016	Thursday	1.56

2/1/2016	Monday	0.21
2/18/2016	Thursday	0.43
3/6/2016	Sunday	0.37
3/7/2016	Monday	0.2
3/12/2016	Saturday	0.44
5/7/2016	Saturday	0.62
10/17/2016	Monday	0.17
10/24/2016	Monday	0.32
10/25/2016	Tuesday	0.1
11/21/2016	Monday	0.87
11/27/2016	Sunday	0.5
12/16/2016	Friday	1.56
12/22/2016	Thursday	1.16
12/23/2016	Friday	0.29
12/24/2016	Saturday	1.15
12/31/2016	Saturday	0.86
1/1/2017	Sunday	0.27
1/5/2017	Thursday	0.17
1/6/2017	Friday	0.15
1/9/2017	Monday	0.46
1/11/2017	Wednesday	0.37

1/13/2017	Friday	1.71
1/19/2017	Thursday	0.67
1/20/2017	Friday	1.21
1/22/2017	Sunday	1.77
1/23/2017	Monday	0.14
2/6/2017	Monday	1.09
2/7/2017	Tuesday	0.34
2/11/2017	Saturday	0.14
2/17/2017	Friday	0.53
2/18/2017	Saturday	0.15
2/26/2017	Sunday	0.1
2/27/2017	Monday	0.19
Total Days:		94